



SOCIETY OF
RESEARCH
ADMINISTRATORS
INTERNATIONAL

Subrecipient Monitoring The Basics TH301

May 7, 2026– 1:45 PM – 2:45 PM

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Welcome

- Explore ways to minimize the burden of 2 CFR 200.331-333 requirements
- Pre-Award task determination of subrecipient or contractor
- Post Award requirements of establishing a monitoring plan to mitigate risks and enforcement action
- Understand documentation obligations for monitoring

About Us

*Regnier Jurado – Senior Director Research
Management Solutions*

Donna Kiley – Senior Director Post Award



Participants

- Please ask questions as we go along
- If there are any situations at your institution you would like to discuss we would be happy to address during the presentation
- If the question will be answered later in the presentation, we will let you know

Subrecipient Management and Monitoring

What 2 CFR 200.331-333 requires...

Lots and Lots of stuff like....

Pre-Award (2 CFR Part 200.331 and 200.333)

- Subrecipient vs. contractor determination must be made and documented
- Perform a risk assessment of the Subrecipient
- Fixed amount subawards require the prior written approval from the Federal awarding agency

Subrecipient Management and Monitoring

What 2 CFR 200.331-333 requires...

Lots and Lots of stuff like....

More prescriptive Post-Award requirements (2 CFR Part 200.332)

- Verifying that the subrecipient is not excluded/debarred
- Add a lengthy list of elements to the subaward terms
- Establish a monitoring plan for the subrecipient and enforcement action against noncompliant subrecipients
 - Financial review and Programmatic review
- Must use subrecipient's negotiated F&A rate or provide a 15% MTDC "de minimis" rate (or another negotiated rate with the subrecipient)

Subawards Lifecycle

Pre-Award

Subawards in Proposals

- Identifying our collaborators (adding new organizations when needed)
- Identifying high-risk organizations
- Securing budgets, scope of work, letters of commitment, compliance information, Negotiated F&A rate agreements

Subawards Lifecycle (cont.)

Post-Award

Requesting New Subawards

- Finalizing scope of work and budget
- Authorizing the new sub
- Assessing and managing risks, when needed

Subawards Lifecycle (cont.)

Post-Award

Subaward Monitoring

- Monitoring performance, reviewing and approving deliverables and reports
- Reviewing and approving invoices
- Modifying scope of work and budget during the life of the sub

Subawards Lifecycle (cont.)

Post-Award

Subaward Closeout

- Reviewing and approving deliverables and reports
- Reviewing and approval final payment
- Adjusting funds as needed

FIU Policy Statement

If a sponsored project award includes a subcontract, ORED will conduct a risk analysis on each proposed subcontractor to determine whether the subcontractor is fiscally sound such that a subcontract may be issued. If ORED's risk analysis allows for the issuance of the subcontract, ORED Pre-Award, in consultation with the PI, will prepare and execute the subcontract and any modifications thereto on behalf of the University.

If ORED's risk analysis results in a determination that a subcontract cannot be issued, the PI will be informed, and an alternate subcontractor will be required. ORED will also notify the sponsor of the alternate subcontractor, as needed.

If a subcontract is executed, the subcontractor invoices shall be processed as set forth in the Procedures section below.

FIU Policy Statement (cont.)

It is the responsibility of the PI to ensure that all subcontractors that the PI selects have the technical expertise to perform the work required by the subcontract. If the sponsor award requires the sponsor's prior approval for subcontractors or if the sponsor award contains any export control requirements (e.g., no foreign nationals may work on the project or the sponsor must pre-approve any foreign nationals on the project) and/or a technology control plan is in place to address the export control requirements of the sponsor award, the PI must ensure that he/she has such written approvals and/or complies with the requirements of the technology control plan prior to requesting that ORED prepare the subcontract.

<https://policies.fiu.edu/files/367.pdf>

<https://policies.fiu.edu/files/368.pdf>

DOJ Audit Request



Office Of Research & Economic Development

References for Subaward Processes and procedures

Pre-award

Subcontract preparation and [Payment to Subcontractors on Sponsored Projects – Policy Number 2350.090](#)

See Procedures I. – When Pre-award receives a sponsored award for a project that includes one or more proposed subcontractor(s), the process begins to complete the following:

1. [Subrecipient vs. contractor determination](#)
2. PI completes [Subaward/Amendment Request Form](#)
3. Initial [Subaward Agreement Checklist](#)
4. [Risk Assessment Questionnaire](#)
5. Subaward agreement is prepared with appropriate terms and conditions details explained in [Payment to Subcontractors on Sponsored Projects – Policy Number 2350.090](#) See Procedures I.

DOJ Audit Request (cont.)

Post-award

[Payment to Subcontractors on Sponsored Projects – Policy Number 2350.090](#) See Procedures II, [review and processing of Subcontract Invoices](#) and [Subcontract Fiscal Monitoring – Policy Number 2350.085](#)

Close out

An email notification is sent to the PI requesting to review the Preliminary Report of Expenditures (ROE). This [Report of Expenditure \(ROE\)](#) includes award and project information such as; sponsor name, project period, project budget, and expenditures. It also includes questions to be answered and certified by the PI (Question 5 – If your project included a subcontract.....). Processes described in the [review and processing of subcontract invoices.](#)

Policy Statement

- **NIH** https://grants.nih.gov/grants/policy/nihgps/HTML5/section_15/15.2_administrative_and_other_requirements.htm
- **NSF** <https://new.nsf.gov/policies/pappg/24-1/ch-7-award-administration#ch7B4>
- **DOJ** <https://www.justice.gov/ovw/page/file/1575616/dl?inline=>
- **NEH** <https://www.neh.gov/general-guidance-pass-through-entities-managing-subawards>

Subrecipient and Contractor Determination 2 CFR 200.331(a-c)

- Pass-through entities must make determinations
 - Contractor” has replaced “vendor”
 - Characteristics of a subrecipient and of a contractor (formerly vendor) have not changed
- **Subrecipient:**
 - Has performance measured against the objectives of the Federal program
 - Has responsibility for making programmatic decisions
 - Has responsibility for adherence to Federal program compliance requirements
 - Uses Federal funds to carry out a program of the organization, not to provide goods or services for a program of the pass-through entity
 - Determines who is eligible to receive Federal financial assistance
 - **Contractor:**
 - Provides the goods or services within normal business operations
 - Provides similar goods or services to many different purchasers
 - Operates in a competitive environment
 - Provides goods or services that are ancillary to the operation of the Federal program
 - Is not subject to compliance requirements of the Federal program

Who makes the determination?



How do we make the determination?

Checklist to Determine Subrecipient or Contractor Involvement

Principal Investigator: _____

University Proposal Number: _____

Checklist to Determine Subrecipient or Contractor Involvement

OBJECTIVE: Generally, the determination of the relationship with an entity is verified through the institutional review of the proposal narrative, budget justification, and other related proposal documents, as well as through discussions with key personnel prior to proposal submission. When the relationship remains unclear, this form may provide assistance in making an accurate determination.

INSTRUCTIONS: Complete sections one and two of the checklist by marking all characteristics that apply to the outside entity.

The section with the greatest number of marked characteristics indicates the likely type of relationship the entity will have with the University. On occasion there may be exceptions to the type of relationship indicated by the completed checklist. In these situations, the substance of the relationship should be given greater consideration than the form of agreement between the University and the outside entity. Section 3 should be used to provide documentation on the use of judgement in determining the proper relationship classification.

NAME OF OUTSIDE ENTITY: _____

SECTION 1 - SUBRECIPIENT

Description: A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

- 1. Determines who is eligible to receive what Federal assistance;
- 2. Has its performance measured in relation to whether objectives of a Federal program were met;
- 3. Has responsibility for programmatic decision making;
- 4. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

Entities that include these characteristics are responsible for adherence to applicable Federal program requirements specified in the Federal award.

Checklist to Determine Subrecipient or Contractor Involvement (cont.)

SECTION 2 - CONTRACTOR

Description: A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the non-Federal entity receiving the Federal funds:

- 1. Provides the goods and services within normal business operations;
- 2. Provides similar goods or services to many different purchasers;
- 3. Normally operates in a competitive environment;
- 4. Provides goods or services that are ancillary to the operation of the Federal program.

Entities that include these characteristics are not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

SECTION 3 - USE OF JUDGEMENT

Description: In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.

Explanation of Use of Judgement Determination:

FINAL DETERMINATION:

SUBRECIPIENT

CONTRACTOR

Authorized Signature: _____

Date: _____

DEFINITIONS FROM Uniform Guidance (2 CFR, Part 200)

Subrecipient (§200.93):

Subrecipient means 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. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

Contractor (§200.23):

Contractor means an entity that receives a contract as defined in §200.22 Contract.

§200.22 Contract means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award.

Differences in Types of Subawards

Cost Reimbursable:

- Standard cost reimbursable agreements require the subrecipient to submit an invoice after project costs have been incurred.
- Used for most federally funded projects.
- Used when there is less assurance of a specific deliverable being met.
- Allows for more flexibility for cost fluctuations.
- Minimizes the risk of compliance violations.

Fixed Amount Subawards:

- Fixed amount subawards are used when the project scope has measurable goals and objectives and prior written approval from the Federal agency (up to \$500,000).
- Budgets are determined in accordance with subrecipient's proposal, available pricing data, and using cost principles.
- Accountability must be based on performance and results.
- No routine monitoring of the actual costs incurred is expected, however, requires additional programmatic monitoring.

Subrecipient Differences

For-profit Subrecipients:

- **Transparency:**
 - **Audits:** Some entities do not want provide financial statement which restricts are ability to assess risk.
 - **Rate justification/documentation:** Many entities do not want provide NICRA or rate documentation to Recipient.
- **Budget:**
 - **Profit (not allowed per 200.400):** Must not earn or keep any profit resulting from Federal financial assistance unless specifically authorized.
 - **F&A rate:** If entity does not have a NICRA, then Recipient has to negotiate rate (take on risk) or have have entity take de minimus. The de minimus will not be acceptable.

Subrecipient Differences

International Subrecipients:

- **Subrecipient Monitoring:** Many times entities are assessed as higher risk due to lack of audit or federal funds.
- **Budget:** Considerations are generally different from a domestic subrecipient. Items such as overseas allowances, insurances, in-country office expenses.
- **Sponsor specific requirements,** e.g. NIH foreign subrecipient requirement to provide copies of all documentation.
- **Potential Challenges:** governing law, currency fluctuations, language barriers, political and safety risk factors, cultural differences.

Risk Assessment

2 CFR 200.332(c)



- A pass-through entity **must** evaluate each subrecipient's risk.

Risk Assessment

2 CFR 200.332(c) (cont.)

Expanded Clearinghouse

- FDP system that publishes on-line organizational profiles for use in lieu of subrecipient commitment forms
- Pass-through entities utilize this publicly-available information when issuing subawards or monitoring subrecipient organizations
- Reduces burden at both proposal and award stages
- Intended to replace unique pass-through entity letter of intent or commitment forms
- There are currently 376 profiles: 216 for FDP members, and 159 for non-members, who pay an annual fee

Risk Assessment

2 CFR 200.332(c) (cont.)

<https://thefdp.org/demonstrations-resources/subaward-templates-and-tools/>



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SUBAWARD TEMPLATES AND TOOLS

All resources are periodically reviewed and updated by the Subawards Subcommittee with the effort and support of its various working groups, with input from the membership. Revised versions are posted to this page as needed.

Please do not complete templates in your browser. Instead, users are encouraged to download the file, save it locally, then complete.

Questions

For more information, please review the guidance documents and FAQs provided below. Contact the Subawards Subcommittee co-chairs at subawards@thefdp.org for additional assistance.

The FDP makes no representation or warranties regarding the suitability of these templates for use on any federal or non-federal sponsored project. The pass-through entity (PTE) is responsible for ensuring all required terms and conditions flow down to a subrecipient. All users utilize these templates at their own risk.

Risk Assessment

2 CFR 200.332(c) (cont.)



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■ Subaward Templates

■ Subawards to Foreign/Non-U.S. Organizations

■ Subcontracts

■ Clinical Research Subawards

■ Subawards: Optional Attachments

■ Subrecipient Risk Assessment, Monitoring, and Other Tools

? FAQs and General Guidance

FDP Subaward Templates

Pass-through entities (PTEs) can use these PDF-fillable templates to issue subawards to U.S.-based subrecipient organizations under federally-funded grants and cooperative agreements, subject to the Uniform Guidance. *Do not complete templates in your browser. Download first, save the file, then complete.*

Subaward Templates

- [FDP Cost Reimbursement Subaward \(rev. July 2025\)](#)
- [FDP Fixed Amount Subaward \(rev. July 2025\)](#)

Attachments 3A and 3B (Contact Information for PTE and Subrecipient)

- [Attachment 3A Pass-through Entity \(PTE\) Contacts](#) – rev. September 2019
- [Attachment 3B Subrecipient Contacts – Page 1 \(rev. May 2025\)](#)
- [Attachment 3B Subrecipient Contacts both pages \(rev. May 2025\)](#)



Risk Assessment 2 CFR 200.332(c) (cont.)



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? FAQs and General Guidance

■ Supporting Documentation

Attachments 3A and 3B (Contact Information for PTE and Subrecipient)

- [Attachment 3A Pass-through Entity \(PTE\) Contacts](#) – rev. September 2019
- [Attachment 3B Subrecipient Contacts – Page 1 \(rev. May 2025\)](#)
- [Attachment 3B Subrecipient Contacts both pages \(rev. May 2025\)](#)

Amendments

- [FDP Subaward Amendment \(Bilateral Free Text, rev. May 2025\)](#)
- [FDP Subaward Amendment \(Bilateral with Preset Options, rev. May 2025\)](#)
- [FDP Subaward Amendment \(Unilateral, rev. May 2025\)](#)

Risk Assessment

2 CFR 200.332(c) (cont.)



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■ Subawards: Optional Attachments

■ **Subrecipient Risk Assessment, Monitoring, and Other Tools**

? FAQs and General Guidance

Subrecipient Risk Assessment, Monitoring, and Other Tools

For questions related to any of the following tools, please send an email to ExpClearinghouse@thefdp.org, and identify the tool in the subject line.

- [Risk Assessment Questionnaire \(RAQ\)](#) – October 2024, used to conduct streamlined risk assessments at the institution and project levels for new and ongoing subawards.
- [Financial Questionnaire](#) – October 2024, used to assess the systems and internal controls of organizations not subject to the Single Audit.
- [Subrecipient vs Contractor Checklist \(PDF version\)](#) – August 2016, used to conduct and document streamlined assessments of relationships with potential collaborators.
- [Subrecipient vs. Contractor Checklist \(Excel version\)](#) – August 2016
- [Sample Invoice Template](#) – June 2015, optional for subrecipients without their own invoicing templates. May be modified as necessary.



Risk Assessment

2 CFR 200.332(c) (cont.)

https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fthefdp.org%2Fwp-content%2Fuploads%2FRisk-Assessment-Questionnaire_10.2024.xlsx&wdOrigin=BROWSELINK

RISK ASSESSMENT QUESTIONNAIRE (RAQ)				
1				
2				
3	Entity Name			
4	Entity's Fiscal Year End (month/day)			
5	Is Entity Subject to Single Audit?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
6	PTE-issued management decision	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
7	Internal Entity Identifier			
8	Does the Entity have an FDP Expanded Clearinghouse Profile?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
9	Entity's UEI #			
10	Entity's EIN #			
11	Entity's FWA #			
12	Entity's OLAW #			
13	SAM Expiration Date (Optional)			
14	Date of Previous Review			
15				
16	Threshold Questions (Not Scored)	Yes	No	N/A
17	<i>If YES to 1, 2, or 3, consider alternatives to initiating agreement:</i>			
18	1 Is the Subrecipient Institution presently debarred or suspended?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19	2 Is the Subrecipient Institution's PI (or other principals, as required) presently debarred or suspended?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
20	3 Does the Subrecipient show "debt offset" in SAM?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21				
22	<i>If NO to 4, 5, or 6, consider alternatives to initiating agreement:</i>			
23	4 Does the Subrecipient have an acceptable accounting system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24	5 Does the Subrecipient have an acceptable procurement system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25	6 If subject to Single Audit, has the Subrecipient completed Uniform Guidance Single Audit requirements?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Risk Assessment

2 CFR 200.332(c) (cont.)



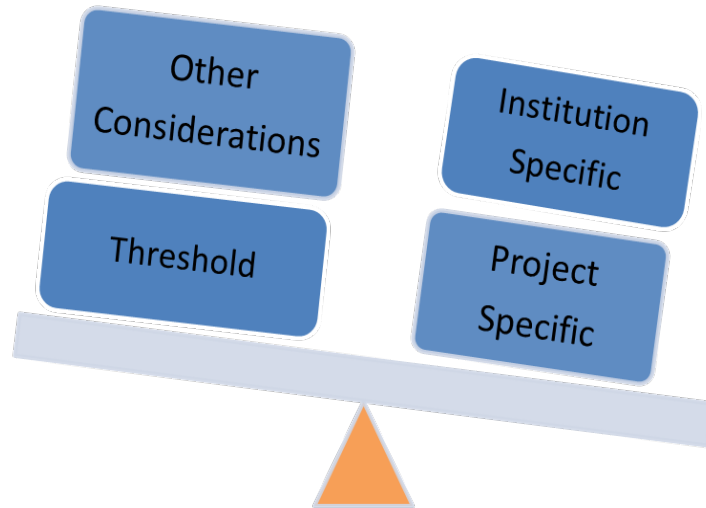
Research Security & Subawards Working Group

The group will work at the intersection of Research Security and Subawards to do the following:

- Keep up with research security requirements as they are implemented by federal agencies
- Consider options to update FDP subaward tools (e.g., subaward agreement templates, Expanded Clearinghouse website, sample Letter of Intent) to address subrecipient compliance
- Engage with the membership periodically to get feedback on proposed options
- Coordinate with the Subawards Subcommittee and Research Security Subcommittee as needed

Risk Mitigation

2 CFR 200.332(d)



Risk Mitigation

2 CFR 200.332(d) (cont.)

Pass-through entity **must** consider imposing specific subaward conditions upon a Subrecipient if appropriate.

Risk Mitigation

2 CFR 200.332(d) (cont.)

Possible Ways to Mitigate Risk on Subawards

- Require strict payment or deliverable schedule
 - Monthly invoices to coincide with monthly deliverables

\$ \$ \$

Risk Mitigation

2 CFR 200.332(d) (cont.)

Possible Ways to Mitigate Risk on Subawards

- Request backup documentation on invoices
- Request subrecipients policies and procedures



Risk Mitigation

2 CFR 200.332(d) (cont.)

Possible Ways to Mitigate Risk on Subawards

- Eliminate administrative flexibilities provided by the prime sponsor.
- i.e. Do not flow down to the subrecipient certain authorities such as rebudgeting capabilities

Risk Mitigation

2 CFR 200.332(d) (cont.)

Notification to the subrecipient

- Nature of the additional requirements
- Reason why the additional requirements are imposed
- Nature of the action needed to remove the additional requirements if applicable
- Method for requesting reconsideration of the additional requirements imposed

Subaward Monitoring

2 CFR 200.332(e)



Pass-through entities **must** monitor the activities of the Subrecipient as necessary to ensure the subaward is used for authorized purposes.

- Review financial and programmatic reports 2 CFR 200.332(e)(1)
- Follow up and ensuring that the subrecipient takes corrective action on all significant developments that negatively affect the subaward 2 CFR 200.332(e)(2)
- Issue a management decision for audit findings 2 CFR 200.332(e)(3)

Subaward Monitoring

Pass-through entities should develop monitoring objectives to ensure subrecipients:

- Carry out program activities as stipulated in the subaward;
 - Have adequate internal controls to protect federal funds;
 - Claim reimbursement for costs that are allowable, reasonable, allocable, and necessary under program guidelines;
 - Identify any conflicts of interest that exist; and
 - Maintain required supporting documentation/records.

Subaward Monitoring

Process for monitoring invoices

- Invoices are sent to a general mailbox (this information is included in the terms and conditions of the subaward)
- The general mailbox is monitored, and action is taken when an invoice is received
 - Review the invoice, review the subaward if additional documentation was requested when invoices are to be submitted verify that the information has been received.
 - Provide the PI a copy of the invoice and if applicable any supporting documentation.

Subaward Monitoring

Process for monitoring invoices

- Review PI response to make sure all compliance requirements have been met (i.e. progress on the scope of work has taken place to coincide with the invoices)
- Invoice can then be forwarded to purchasing for payment to the subawardee

Subcontract/Subaward Invoice Approval Form

Agreement Number:

Project ID Number:

Subcontractor/Consultant:

Invoice Number:

Are the amounts invoices reasonable based on the technical progress of the project?

Yes No

Is the subcontractor/Subrecipient/Consultant satisfactorily performing the Scope of Work?

Yes No

Have all issues (if any) with the fiscal administration of the subaward been addressed with ORED?

Yes No N/A

If you answered No to any of these questions, please describe your plan of action to remedy the situation.

I certify 1) that the information submitted above is accurate to the best of my knowledge; 2) that any false, fictitious, or fraudulent statement or claims may subject me (the Principal Investigator) to criminal, civil, or administrative penalties; and 3) that I (the Principal Investigator) accept the responsibility for the scientific conduct of my project's sub recipients.

PI Signature:

PI Name:

Date:

Please return this form within 10 working days in order to comply with 2 CFR 200.305(b)(3).

Enforcement

2 CFR 200.332(i)

- Pass-through entities **must** consider taking enforcement action against noncompliant subrecipients as described in 2 CFR 200.339 (remedies for noncompliance)



Subrecipient Enforcement Measures—Post Award

- Contact subrecipient officials to discuss areas of concern
- Review backup documentation to support invoice expenditures

Subrecipient Enforcement Measures—Post Award (cont.)

- Review subrecipient single audit or program specific audit results, if available
- Schedule site visits to review supporting documentation to support invoiced expenditures.
- Arrange for outside audit

2 CFR 200.339

Remedies for Noncompliance

- Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity.
- Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.

2 CFR 200.339

Remedies for Noncompliance (cont.)

- Wholly or partly suspend or terminate the award.
- Initiate suspension or debarment proceedings as authorized under 2 CFR part 180 and Federal awarding agency regulations (or in the case of a pass-through entity, recommend such a proceeding be initiated by a Federal awarding agency).

2 CFR 200.339

Remedies for Noncompliance (cont.)

- Withhold further awards for the project or program.
- Take other remedies that may be legally available.



Close-out Stage

Meet with PI to ascertain successful project completion by subrecipient

- Verify receipt of all technical and financial reports
 - Cost Reimbursable: Verify receipt and accuracy of invoice marked “FINAL”
 - Fixed Amount Sub: Confirm receipt of certification of Completion (200.201(b)(3))



Close-out Stage

REPORT OF EXPENDITURES (ROE):

Date: 1/3/2024

Project ID# _____

Award # _____

Sponsor Name: _____

External Sponsor Number: _____

Award / Project Begin Date: _____

Award / Project End Date: _____

Type of Award: _____

Award / Project Total Budget: _____

Expenditures to Date: _____

Unspent Balance* \$ _____ -



Office of Research & Economic Development (ORED)

Principal Investigator: _____

Department: _____

Administrator: _____

Post Award Manager: _____

Return ROE by: _____

Cost Share Project ID#(s) _____

Cost Share Type (E&G...) _____

Total Cost Share Amount: \$ _____ -

Reported to Date: \$ _____ -

Unreported Balance: \$ _____ -

*ONLY in Fixed Price Awards is the unspent balance above considered residual
 On a case by case basis, the Vice President for Research may provide for alternate disposition of remaining balances in fixed price project IDs

Please answer the following questions as they pertain to the above mentioned project.

Yes	No	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1) Are there any costs pending to post in the attached Grant Activity Report such as: tuition, travel, Pcard, payroll, ect? Or are there any costs that need to be removed? If so, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2) Are there any open Purchase Orders or Travel Authorizations? If so, review what may be pending to pay and contact the buyer associated with the Purchase Order (7-2161) or the travel department (7-2131) to release the encumbrance balance(s).
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3) If a capital equipment item was purchased or transferred to this project, does the title vest with FIU? If not, complete the appropriate form(s) located in the Controller's website at: http://finance.fiu.edu/controller/Forms.html
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4) Do you have a residual of unused supplies with a total aggregate fair market value exceeding \$5,000?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5) If your project included a subcontract, was the work completed satisfactorily and were all payments made? Were all programmatic or technical reports received, and was a copy forwarded to ORED?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6) Are the highlighted charges on the attached Grant Activity Report allocable to this project? If not, please attach a transfer form. If there are costs under the restricted account codes, were these approved with a Direct Charge Exemption Form (DCE) ? If not, attach DCE form when returning this form to ORED. The form is available in the Research website at http://research.fiu.edu/proposal-preparation/pages/forms.html . Examples of restricted costs; Postage, Office & Computer Supplies, Memberships, Subscriptions, General Purpose Software....



Close-out Stage

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7) Were the appropriate University Units notified to stop or re-direct any recurring charges? NOTE: Some may require weeks of advance notice.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8) Was the advance for participant payments or purchase of gift cards reconciled, and settled with the Controller's Office? A copy of the final reconciliation should be provided to ORED.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9) Was paperwork submitted to Human Resources to remove or re-allocate personnel being paid from your project (Review the HR/PR submission deadlines)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10) If you were the recipient of a federal award with international travel, was Fly America Act followed?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	11) Was cost share required and met? If a Cost Share Project ID was not created, forward Cost Share Form to ORED. Cost share forms can be downloaded from: http://research.fiu.edu/award-management/pages/forms.html
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12) Were all technical / programmatic reports submitted to the sponsor and copies sent to ORED? If not, please complete and forward to the sponsor and copy to ORED.
<input type="checkbox"/>	<input type="checkbox"/>		13) Was an invention or discovery made or reduced to practice in the course of, or under this project? Note: this includes any work done under the project's subcontract(s) and subproject(s)
<input type="checkbox"/>	<input type="checkbox"/>		14) If you answered yes to question 13 then was an intellectual property disclosure form submitted to the Office of Intellectual Property Management? Note: if you have not done so, contact the IP Management Office at ext. 7-0008 for assistance with the disclosure process.
COMMENTS:			

Final: Print, sign and return to your Post Award Manager via email or interoffice mail to MARC 470

NOTE: All records pertaining to this project and its cost share must be retained for audit purposes as required by the granting agency. If you are audited, you will be responsible to present supporting documentation.

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise.

Principal Investigator's Signature

Date



Close-out Stage

Subrecipient Expenditure Invoice Template

Invoice Number: Invoice Date: Invoice Period: Invoice Amount: \$0.00	Subaward Number: Award Number: Subaward PI Name:	
Subrecipient Name Subrecipient Address	<input type="checkbox"/> Check if final invoice	

Expense Categories	Expenditures for Invoice Period	Cumulative Expenditures	Cost Share Expenditures for Invoice Period	Cost Share Cumulative Expenditures
Project Costs				
Personnel salaries				
Fringe Benefits				
Domestic Travel				
International Travel				
Equipment*				
Supplies & Materials				
Consultants				
Subawards				
Other Direct Costs				
Total Direct Costs	\$0.00	\$0.00	\$0.00	\$0.00
F&A Costs				
Total Costs	\$0.00	\$0.00	\$0.00	\$0.00

*Equipment definition: refer to PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS, Subpart A, §200.1 Equipment.

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812).

Subrecipient authorized representative name and title	Phone Number
Subrecipient authorized representative signature	Date
Date Invoice received: _____ Date paid: _____	



Close-out Stage

- Fixed Amount Sub: Confirm receipt of certification of Completion (200.201(b)(3))
 - *The non-Federal entity must certify in writing to the pass-through entity at the end of the Federal award that the project or activity was completed or the level of effort was expended.*

Current Hot Topics in Subawards

Questions?

Contact Information

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