

Subrecipient Monitoring

The purpose of this document is to outline the standards for Subrecipient Monitoring. This document establishes the standards and procedures for Subrecipient Monitoring at South Texas College that are compliant with federal regulations. These standards and procedures apply to all subawards for grants awarded to South Texas College.

1. Who is involved in Subrecipient Monitoring?

South Texas College is responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure compliance with appropriate use of funds, as well as timely and effective implementation of the subaward by the subrecipient or subawardee. The Project Director/Principal Investigator of a grant is responsible for engaging in monitoring subrecipients and works in collaboration with staff in the Department of Resource Development, Management and Compliance that provide post-award technical assistance to help ensure deliverables are met and to review and assist in responding to any deficiencies or problems related to performance reports, financial reports in Management Tracker, or subaward activity.

It is required for all grants that the Project Director (PD) / Principal Investigator (PI) be engaged in conducting Subrecipient Monitoring of subawards for grants that they are assigned to in collaboration with the staff member assigned to provide post-award compliance support from the Department of Resource Development, Management and Compliance.

2. Why is Subrecipient Monitoring important?

Subrecipient Monitoring is important to ensure that South Texas College is compliant with regulations outlined in the Education Department General Administrative Regulations (EDGAR), particularly with 2 CFR Part 200.330, Part 200.331(b), Part 200.331(c), Part 200.331(d)(1-3), and Part 200.331(h) related to Subrecipient Monitoring.

3. How does South Texas College determine if an entity is a subrecipient or a vendor?

Subrecipient/Contractor Determination - 2 CFR Part 200.330

South Texas College's Department of Resource Development, Management and Compliance works collaboratively with faculty and staff when developing proposals or applications for grants. In this phase, a Collaborative Grant Proposal Development team is formed and they will determine whether the grant will have subrecipients or vendors. The *Subrecipient v. Contractor/Vendor Determination Checklist* (Figure 1) is completed to help make this determination.

Note that the characteristics listed within the form may not be present in all cases. Grant Proposal Development staff should use their best judgment to determine the proper classification.

If a grant is awarded to the College that has a subrecipient or more than one, each subrecipient entity is subject to subrecipient monitoring by South Texas College (the lead applicant/fiscal agent of the grant).

If it is determined that an entity is a Contractor/Vendor and the grant is awarded, then they will be considered for approval for the purchasing procurement process.

2 CFR Part 200 provides these definitions, which may help identify a subrecipient and a contractor:

Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

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. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract. The substance of the transaction is important to determine whether a relationship meets the definition of a subaward or contract.

Figure 1

SUBRECIPIENT v. CONTRACTOR/VENDOR DETERMINATION

The purpose of this form is to guide college personnel to make a determination as per 2CFR 200.330.

Grant Name: _____

Name of Outside Entity: _____

Check off all of the following characteristics that apply.

SECTION 1-SUBRECIPIENT

Definition: A non-federal entity that receives a subaward from South Texas College under an award made to South Texas College. A subrecipient is accountable to South Texas College for the use of the funds in carrying out a portion of the programmatic effort under South Texas College's award.

Characteristics that support the non-federal entity as a subrecipient:

- Determines who is eligible to receive what funding assistance
- Has its performance measured against whether it meets the objectives of the program
- Has responsibility for programmatic decision-making
- Has responsibility for adherence to applicable program requirements
- Uses the funds to carry out a program of the organization as compared to providing goods or services for a program of the awarding entity

SECTION 2-CONTRACTOR/VENDOR

Definition: A dealer, distributor, merchant, or other seller *providing goods or services* during normal business operations and are required for the conduct/completion of a sponsored project.

Characteristics of a procurement relationship:

- Provides the goods and services within normal business operations
- Provides similar goods or services to many different entities
- Normally operates in a competitive environment
- Has no responsibility for the project design, conduct, or reporting
- Provides goods and services that are ancillary to the operation of the program
- Is not subject to compliance requirements of the program

FINAL DETERMINATION: SUBRECIPIENT CONTRACTOR/VENDOR

SECTION 3 (OPTIONAL)-USE OF JUDGEMENT (*use only when the determination cannot clearly be made using the above criteria*)

**If it is determined that an entity is a Subrecipient, a Subrecipient Interest Form will be routed and vetted through a Grant Development Officer.*

	REVIEWED	
Reviewed by Grant Development Officer: (Printed Name)	(Signature)	(Date)
	REVIEWED	
Reviewed by Department Proposal Development Lead:	(Signature)	(Date)

Resource Development, Management and Compliance
RDMC-003

12/10/2019

Subrecipient Interest Form

If it is determined that an entity is a Subrecipient, then the entity will be provided a *Subrecipient Interest Form* to complete (See Figure 2). The *Subrecipient Interest Form* must be completed by the Subrecipient organization, signed by an Authorized Representative and submitted to South Texas College's Department of Resource Development, Management and Compliance. This form is used by South Texas College to determine if the entity is a viable party that adds value to a grant application or proposal for funding.

Figure 2



SUBRECIPIENT NAME: _____ Date: _____

SUBRECIPIENT INTEREST FORM

The purpose of this form is to provide information for review by South Texas College as per 2 CFR 200.331(b). This form will be completed by the entity interested in partnering with South Texas College. Information may need to be collected with assistance from your organization's business office and/or grant department. This must be submitted prior to submission of grant application to grants@southtexascollege.edu.

Grant Name: _____

Grant Agency: _____

The purpose of the grant is to: _____

Subrecipient contribution to the project: _____

SUBRECIPIENT INFORMATION

Subrecipient: _____

Subrecipient Project Director (PD)/Principal Investigator (PI): _____

Subrecipient Period of Performance Start Date: _____ End Date: _____

DUNS Number: _____

SAM.gov Registration: Yes No

Subrecipient "AWARD" Address:

Street Address	City	State	Zip
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Is Subrecipient "PLACE OF PERFORMANCE" Address same as "AWARD" Address? Yes No
If NO, please complete below.

Street Address	City	State	Zip
----------------	------	-------	-----

Subrecipient is a: (Check all that apply)

<input type="checkbox"/> Institution of Higher Education	<input type="checkbox"/> Community-Based Organization
<input type="checkbox"/> Hispanic Serving Institution	<input type="checkbox"/> Private
<input type="checkbox"/> Minority Serving Institution	<input type="checkbox"/> Independent School District
<input type="checkbox"/> Veteran Service Organization	<input type="checkbox"/> Other

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RDMC-004

12/10/2019

SUBRECIPIENT NAME: _____ Date: _____

SECTION A: PROPOSAL INFORMATION

The following documents are required from subawardee:

- STATEMENT OF WORK (SOW)
- BUDGET AND BUDGET JUSTIFICATION
- NEGOTIATED FACILITIES AND ADMINISTRATIVE (F&A) RATE AGREEMENT

SECTION B: CONFLICT OF INTEREST

Does your organization have a Conflict of Interest policy aligned to the Uniform Grant Guidance? Yes No
Subawardees must adhere to the Conflict of Interest guidelines within 200.318 General Procurement Standards and 200.319 Competition of the Uniform Grant Guidance.

SECTION C: REGULATORY APPROVAL

Will Human Subjects be involved? Yes No If YES, documentation must be on file and up to date.
Please attach IRB approval.

SECTION D: AUDIT STATUS

Does the subrecipient receive an annual audit in accordance with 2 CFR 200.501? Yes No
If "yes": Has the audit been completed for the most recent fiscal year? Yes No
What fiscal year? _____
Were there any audit findings reported that relate to any requirements of this project? Yes No
If "yes" please explain.

Has your organization received an audit of the same or similar type of subaward other than the annual single audit?
See 2 CFR 200.331(b)(2). Yes No

SECTION E: SUBRECIPIENT QUESTIONNAIRE

1. Does your organization have prior experience with the same or similar type of subawards?
CFR 200.331(b)(1). Yes No
2. Does your organization have new personnel or new or substantially changed systems as it related to performance
for this project since those prior awards? See 2 CFR 200.331(b)(3). Yes No
If "yes" please explain.

3. Has this funding agency conducted a desk review/s or site visit/s for those grants?
CFR 200.331(b)(4). Yes No

4. How does South Texas College determine the level of risk of non-compliance for the purposes of subrecipient monitoring of each subrecipient?

Risk Assessment - 2 CFR Part 200.331(b)

Risk assessment is required to determine the level of risk of a subrecipient. It is necessary to evaluate each subrecipient's risk as per 2 CFR §200.331(b) of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate level of subrecipient monitoring. Federal regulations indicate that the risk assessment must consider the following factors:

- (1) The subrecipient's prior experience with the same or similar subawards;
- (2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F - Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program;
- (3) Whether the subrecipient has new personnel or new or substantially changed systems; and
- (4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency).

The Department of Resource Development, Management and Compliance conducts a thorough Subrecipient Risk Assessment to determine the level of risk of a subrecipient that aligns to the regulation in 2 CFR §200.331(b). The South Texas College Department of Resource Development, Management and Compliance considers the following risk factors when assessing a subrecipient.

Subrecipient Risk Factors:

- The subrecipient's prior experience with the same or similar subawards
 - Weight of Factor: 15%
- The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F - Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program
 - Weight of Factor: 15%
- Unfamiliar/new personnel or new or substantially changed systems
 - Weight of Factor: 10%
- The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency)
 - Weight of Factor: 15%
- Potential for poor financial management of sub-award amount
 - Weight of Factor: 15%
- Potential for failure to meet/address deliverables (reporting, metrics, communication)
 - Weight of Factor: 30%

5. How do the Risk Factors determine the Level of Risk of a subrecipient?

One Risk Level is assigned to each Subrecipient based on the scores generated from the weighted Risk Factors. The range of scores for each level are: **Low** (100-166), **Medium** (167-233), and **High** (234-300).

6. How does South Texas College mitigate risk of non-compliance of subrecipients throughout the life of a grant?

Risk Mitigation - 2 CFR Part 200.331(c)

As stated in 2 CFR §200.331(c), South Texas College must consider imposing specific Subaward conditions upon a subrecipient, if appropriate. A Grant Compliance staff member is assigned to work with the Project Director (PD)/Principal Investigator (PI) of the grant to mitigate risk of non-compliance. The PD/PI works closely with subrecipients and follows-up to ensure subrecipients are making adequate progress.

The conditions and activities imposed on a subrecipient of South Texas College are explained in the Subrecipient Monitoring Chart, Figure 3. The Subrecipient Monitoring Chart, explains the Subrecipient Monitoring Activity to mitigate risk of non-compliance that occurs for a subrecipient, depending on its Risk Level. There are three Risk Levels: Low, Medium, and High.

7. How does the PD/PI and Grant Compliance staff monitor subrecipients?

If the subrecipient's risk is determined as **Low**, a score of 100-166, the staff assigned to the grant in the Department of Resource Development, Management and Compliance will utilize information from the Grant Status Reviews, Programmatic Reports, and (financial) Management Trackers that they gather and review periodically based upon the Grant and Contract Post-Award Support process to ensure that the subrecipient is on track.

If the subrecipient's risk is determined as **Medium**, a score of 167-233, in addition to the review of progress of the subrecipient based on Grant Status Reviews, Programmatic Reports, and (financial) Management Trackers, a staff member from the Department of Resource Development, Management and Compliance will also conduct a *Subrecipient Desk Review*, Figure 4. A *Subrecipient Desk Review* includes a review the following items:

- Memorandum of Understanding/Agreement with Subrecipient
- *Subrecipient Interest Form*, Figure 2, completed in the Development Phase
- Any other documented concerns from the Project Director, Financial Manager, Grant Accounting staff about the subrecipient's programmatic or financial status
- *Project Director (PD)/Principal Investigator (PI) Subrecipient Report*, Figure 5

Grant Compliance will inform the PD/PI and the Subrecipient of conclusions and/or recommendations from the *Subrecipient Desk Review* and will follow-up on progress.

If the subrecipient's risk is determined as **High**, a score of 234-300, in addition to the review of progress of the subrecipient based on Grant Status Reviews, Programmatic Reports, (financial) Management Trackers, and *Project Director (PD)/Principal Investigator (PI) Subrecipient Report* a *Subrecipient Action Plan*, Figure 6, will be required. The purpose of the *Subrecipient Action Plan* is to obtain documented plans of specific actions to achieve grant deliverables to timeline. Grant Compliance will provide a prefilled template with information gathered from the Statement of Work (SOW) received with the *Subrecipient Interest Form* and/or Subrecipient MOU for the subrecipient to complete information on the following:

- Expenses Planned for Deliverable
- Activity to Achieve Deliverable

- Timeline to Complete Activity
- Person Responsible

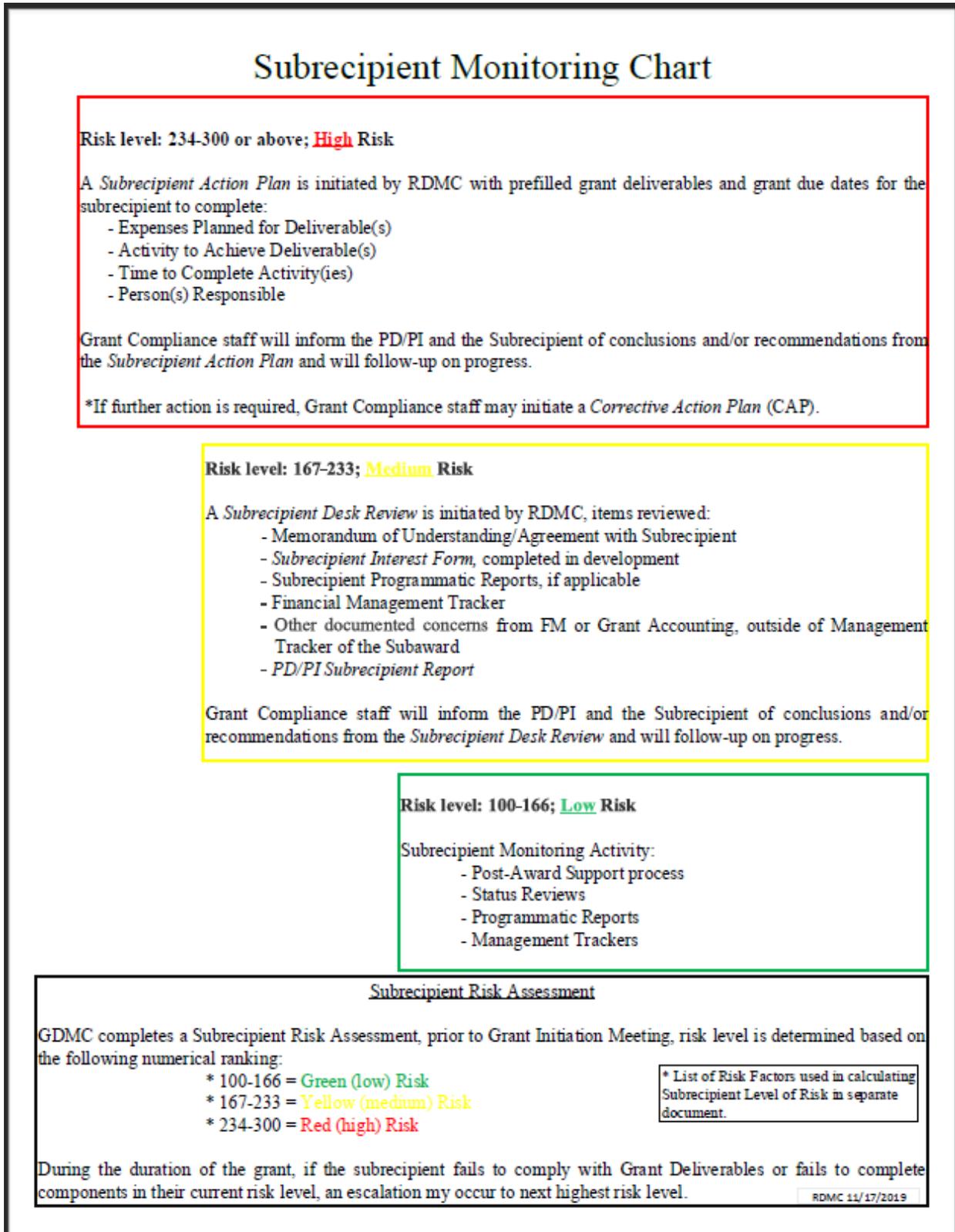
Grant Compliance will inform the PD/PI and the Subrecipient of conclusions and/or recommendations from the *Subrecipient Action Plan* and will follow-up on progress.

*If further escalation is required, Grant Compliance staff may initiate a *Corrective Action Plan (CAP)*, Figure 7.

Subrecipient Monitoring Chart

The Subrecipient Monitoring Chart, Figure 3, explains the components of the subrecipient risk assessment designated levels. Grant Compliance staff will utilize the Subrecipient Monitoring Chart according to the subrecipient's Risk Level in order to monitor the subrecipient to mitigate risk of non-compliance.

Figure 3



Subrecipient Desk Review

The purpose of a *Subrecipient Desk Review*, Figure 4, is to assist Grant Compliance staff to monitor existing activity of the subrecipient's progress in achieving the grant deliverables to timeline. A Grant Compliance staff member will conduct the *Subrecipient Desk Review* and provide comments, conclusions, and/or recommendation based on the items reviewed to the Project Director (PD)/Principal Investigator (PI) and the subrecipient.

Figure 4


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Subrecipient Desk Review

Grant Name: _____ Subrecipient Name: _____
 Agency/Grantor: _____ Grant Period: _____

The purpose of a Subrecipient Desk Review is to assist Grant Compliance staff to monitor existing activity of the subrecipient's progress in achieving the grant deliverables to timeline as per 2 CFR 200.331(c)(d).

Desk Review Checklist for Subrecipient		
Items for Review-If item is accessible, then access. If not, then request a link or email attachment.	RDMC Conducts Review	RDMC Comments
Memorandum of Understanding/Agreement with Subrecipient	Review Obligations of Parties in comparison to project accomplishments.	
Subrecipient Interest Form	Review project accomplishments in comparison to the responses provided.	
Subrecipient Programmatic Reports, if applicable	Review the programmatic report/s in comparison to the grant programmatic deliverables.	
Financial Management Tracker	Review management tracker in comparison to the grant financial deliverables.	
Other Documented Concerns Outside of Management Tracker	Assess prior communication to review potential ongoing concerns/challenges with the subrecipient.	
Project Director (PD)/Principal Investigator (P/I) Subrecipient Report	Review the report for communication with subrecipient, subrecipient activity and potential concerns/challenges.	
RDMC Conclusion:		
Subrecipient Action Plan Recommendation? Yes <input type="checkbox"/> No <input type="checkbox"/>	Comment:	

Grant Compliance Staff: _____ Date: _____

Resource Development, Management and Compliance November 15, 2019

Project Director (PD)/Project Investigator (PI) Subrecipient Report

The PD/PI is responsible for completion and the quarterly submission of the *Project Director (PD)/Project Investigator (PI) Subrecipient Report*, Figure 5. Grant Compliance staff will review the *Project Director (PD)/Project Investigator (PI) Subrecipient Report* to monitor the progress made by the subrecipient and identify any areas of noncompliance promptly when the subrecipient is identified as a medium-risk or a high-risk level.

Figure 5

Quarter Mo. to Mo.


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Project Director (PD)/Principal Investigator (PI) Subrecipient Report

The PD/PI is responsible for the quarterly submission of this report to RDMC when the subrecipient is identified as a medium-risk or high-risk level. The purpose of this form is to review and monitor progress or setbacks and areas of non-compliance as per 2 CFR Part 200.331(c)(d).

Submitted By:	<input style="width: 95%;" type="text"/>
Subrecipient:	<input style="width: 95%;" type="text"/>
Grant Name:	<input style="width: 95%;" type="text"/>
Subaward Term:	<input style="width: 95%;" type="text"/>

During this quarter, list major activities to achieve deliverables for the purpose of the grant. *If more activities are identified, fill additional RDMC-011 form(s).*

Activity 1

Activity Description:	<input style="width: 65%;" type="text"/>
100% Complete? Yes <input type="checkbox"/> No <input type="checkbox"/>	If not, next steps: <input style="width: 80%;" type="text"/>
Were any barriers encountered within this quarter for this activity?	<input style="width: 95%;" type="text"/>

Activity 2

Activity Description:	<input style="width: 65%;" type="text"/>
100% Complete? Yes <input type="checkbox"/> No <input type="checkbox"/>	If not, next steps: <input style="width: 80%;" type="text"/>
Were any barriers encountered within this quarter for this activity?	<input style="width: 95%;" type="text"/>

Activity 3

Activity Description:	<input style="width: 65%;" type="text"/>
100% Complete? Yes <input type="checkbox"/> No <input type="checkbox"/>	If not, next steps: <input style="width: 80%;" type="text"/>
Were any barriers encountered within this quarter for this activity?	<input style="width: 95%;" type="text"/>

Overall are you on track with all required deliverables? Yes No

If "no", please comment.

Do you have evidence of all activity for reporting and auditing purposes? Yes No

If "no", please comment.

Resource Development, Management and Compliance
RDMC-011
November 15, 2019

Subrecipient Action Plan

The purpose of a *Subrecipient Action Plan*, Figure 6, is to assist the subrecipient to develop and follow a clearly documented plan with specific actions to achieve grant deliverables to timeline. A Grant Compliance staff member will provide the Plan template that will be pre-filled with grant deliverable(s) and due date(s). The subrecipient will complete the remaining information and submit for review by the Project Director/Principal Investigator and the Grant Compliance staff member assigned to the grant.

Figure 6



**SOUTH TEXAS
COLLEGE**

Subrecipient Action Plan
2 CFR.200.331(c)(d)

Grant Name: _____

Agency/Grantor: _____

Subrecipient Name: _____

Grant Period: _____

Grant Compliance staff will pre-fill the grant deliverable(s) and due date(s). The subrecipient will enter: the activity to achieve the grant deliverable, the expenses planned to achieve the deliverable, the timeline to complete the activity, and the person responsible. Once complete the subrecipient will submit the form for review to the Project Director/Principal Investigator and the Grant Compliance staff member assigned to the grant.

Subrecipient Action Plan					
RDMC Use					
Grant Due Date	Grant Deliverable	Activity to Achieve Deliverable	Expenses Planned for Deliverable	Timeline to Complete Activity	Person Responsible

Comments: _____

Recommendations: _____

Reviewed by PD/PI: (Printed Name)

Reviewed by Grant Compliance Staff: (Printed Name)

 _____
(Signature)

 _____
(Signature)

(Date)

(Date)

Resource Development, Management and Compliance

RDMC-012

November 27, 2019

Corrective Action Plan

A *Corrective Action Plan (CAP)*, Figure 7, will be prefilled by Grant Compliance staff with problems or concerns identified. The subrecipient will complete in the remaining information and submit the CAP for review by the PD/PI and the Grant Compliance member. The CAP is designed to document specific concerns or problems related to risk of non-compliance, potential solutions or activities to remedy the concern/problem, the name(s) of individuals responsible for carrying out each action, and to establish a timeline for completion of planned activities.

Figure 7



SOUTH TEXAS COLLEGE

CORRECTIVE ACTION PLAN (CAP)
2 CFR 200.331(c)(8)

In response to the Subrecipient Monitoring Concerns

Due Date: _____

Grant Compliance staff will pre-fill concerns. The subrecipient will enter: what corrective action will take place, tools & resources needed, who will be responsible for completing the action, and the target date for completion.

No.	Concerns	Corrective Action	Tools & Resources	Responsible Person, Title, Department	Target Completion Date

I certify that, to the best of my knowledge and belief, the statements provided here are true and correct.

Subrecipient Contact Signature: _____ **Date:** _____
(Subrecipient Contact Printed Name & Title)

Please submit completed form by the due date via email to the Grant Compliance staff _____
(Grant Compliance Staff Name)

(Grant Compliance Staff Title) _____ (Grant Compliance Staff Email) assigned to the grant with a copy to the South Texas College

Project Director/Principal Investigator _____
(PD/PI Name) _____ (PD/PI Email)

Resource Development, Management and Compliance RDMC-013 December 10, 2019

SDF Dynamics – Additional Tool for Monitoring Progress of Skills Development Fund Grants

Skills Development Fund (SDF) Grants from the Texas Workforce Commission (TWC) are for job-training programs that provide local customized training opportunities for Texas businesses and workers to increase skill levels and wages of the Texas workforce. To help ensure training is completed on-time and on-budget, a tool, Figures 8 & 9, has been created for use by South Texas College in collaboration with the Texas Workforce Commission. This tool is for use by the college Project Director of the SDF grant and each subrecipient/training provider. This tool tracks actual training hours as well as expenditures on an actualized basis, and it provides future projections for training to be provided to the end of the grant funding period.

Figure 8

Data entry by week of training and course. Tells you how many participants and training hours, need as well as a budget by course.

STC & Partner		5/15/2019																			
Click to go to 1. Break - Even View-Hours		Course 1	Course 2	Course 3	Course 4	Course 5	Course 6	Course 7	Course 8	Course 9	Course 10	Course 11	Course 12	Course 13	Course 14	Course 15	Course 16	Course 17	Course 18	Course 19	Course 20
Training Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider
Course Cost Per Hour	\$40.59	\$92.46	\$13.87	\$51.55	\$42.97	\$44.40	\$47.06	\$94.47	\$94.47	\$66.66	\$37.67	\$68.46	\$68.46	\$44.53	\$65.86	\$94.47	\$11.25	\$11.04	\$10.57	\$4	
Course Type	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech	Bus. Tech
Hours per Course	10	10	1	16	16	16	24	16	16	16	16	16	16	16	16	16	1	12	4		
Number of Trainees	100	15	400	15	25	20	10	6	6	10	20	10	10	20	10	6	400	500	110		
Budgeted (CBM) Hrs 44,004	1,000	150	400	240	400	320	240	96	96	160	320	160	160	320	160	96	400	6,000	440		
Planned (p) Hrs 44,004	1,000	150	400	240	400	320	240	96	96	160	320	160	160	320	160	96	400	6,000	440		
Completed (c) Hrs 568	50	0	37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Ttl Planned on Budget (Excellent!) (Plnd - BDG)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Ttl Completed Under Budget (Cmpltd - BDG) -43,436	(950)	(150)	(363)	(240)	(400)	(320)	(240)	(96)	(96)	(160)	(320)	(160)	(160)	(320)	(160)	(96)	(400)	(6,000)	(440)		
Variance Codes (Cmpltd - BDG)	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	PlndHrs	
Wk 1	Monday, March 18, 2019																				
Wk 2	Monday, March 25, 2019			19																	
Wk 3	Monday, April 01, 2019																				
Wk 4	Monday, April 08, 2019																				
Wk 5	Monday, April 15, 2019																				
Wk 6	Monday, April 22, 2019	50																			
Wk 7	Monday, April 29, 2019			18																	
Wk 8	Monday, May 06, 2019																				
Wk 9	Monday, May 13, 2019																				
Wk 10	Monday, May 20, 2019	30																	48		
Wk 11	Monday, May 27, 2019			19																	
Wk 12	Monday, June 03, 2019																				
Wk 13	Monday, June 10, 2019																				
Wk 14	Monday, June 17, 2019																				
Wk 15	Monday, June 24, 2019	50		15															60		
Wk 16	Monday, July 01, 2019																				

Figure 9

Report Showing entire grant by week and blue bars show training hours completed vs goal of green line:



2 CFR Part 200.331(d)

In 2 CFR §200.331(d), federal regulations state that the pass-through agency, South Texas College, must monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. The Subrecipient Monitoring Chart shown in Figure 3. explains how South Texas College monitors subrecipients. If progress is inadequate, a subrecipient may be moved to a higher level of risk and additional conditions to mitigate risk of non-compliance may be assigned to the subrecipient.

- (1) Reviewing financial and performance reports required by the pass-through entity.
- (2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.
- (3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by §200.521 Management decision.

8. Does the college communicate with subrecipient about audit findings?

2 CFR Part 200.521

As stated in 2 CFR §200.521 (c), a *Pass-through entity*. As provided in §200.331 Requirements for pass-through entities, paragraph (d), the pass-through entity must be responsible for issuing a management decision for audit findings that relate to Federal awards it makes to subrecipients.

South Texas College's Department of Resource Development, Management and Compliance will communicate with the subrecipient to inform them of any audit findings that related to awards it makes to subrecipients.

In accordance with the regulation in 2 CFR §200.521(d), *Time requirements*, the Federal awarding agency or pass-through entity responsible for issuing a management decision must do so within six months of acceptance of the audit report by the Federal Audit Clearinghouse (FAC). The auditee must initiate and proceed with corrective action as rapidly as possible and corrective action should begin no later than upon receipt of the audit report. To comply with this regulation, South Texas College will initiate and proceed with any corrective action documented in an audit report and will communicate any relevant management decisions to the subrecipient within six months of acceptance of an audit report.

9. What enforcement actions could the college take against noncompliant subrecipients?

2 CFR Part 200.331(h)

As stated in the federal regulation found in 2 CFR §200.331(h), the pass-through agency must consider taking enforcement action against noncompliant subrecipients as described in §200.338 that relates to Remedies for Noncompliance.

Enforcement measures will vary by grant. The measures may include, but are not limited to:

- Review and possible amendment to the Memorandum of Agreement with the subrecipient to strengthen probability of successfully accomplishing the intended grant outcomes

- Placing a time hold on future partnerships with the subrecipient
- Termination of subrecipient status

The Department of Resource Development, Management and Compliance will assist the Project Director/Principal Investigator of the grant to determine appropriate enforcement measures.