200.331 (b) Evaluate each subrecipient’s risk of non-compliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring which may include consideration of such factors as:

- Experience with the same or similar awards
- Results of previous audits
- Whether subrecipient has new personnel or new or substantially changed systems
- Extent and result of federal awarding agency monitoring of the subrecipient
- Pass-through are entities required to use Federal Audit Clearinghouse to verify audit reports (200.512)
Subrecipient Risk Assessment

Depending on the risk assessment:

- Provide subrecipients with training and technical assistance
- Perform on-site reviews
- Arrange for agreed-upon-procedure engagements (requires prior approval, 200.425).
Subrecipient Management and Monitoring 200.331

The pass-through entity **must:**

- Put specific information in the subaward, including indirect cost rate
- Do a risk assessment to determine appropriate subrecipient monitoring AND **must** monitor subrecipients
- Consider if specific subaward conditions are needed
- Verify subrecipients have audits in accordance with Subpart F
- Make any necessary adjustment to the pass-through entity’s records based on reviews and audits of subrecipients
- Consider actions to address subrecipient noncompliance
- Report in accordance with FFATA
To facilitate our compliance in regard to the risk assessment and monitoring requirements, OSR has been working with ORIS and have developed a new Subcontractor Module in RAMSeS.

We have now had a demo of the new module and made suggestions of other data elements to be included.

In addition to profiles for each subcontractor, we will be capturing performance history; debarment and suspension status; PHS compliant COI policy; audit findings and corrective action; timely submission of deliverables, to name a few.
Subrecipient Documentation

Documents needed for non-competing continuation applications. (including foundations and industry-sponsored)

- LOI or PHS 2590
- Budget
- Budget Justification
- Statement of Work
- NIH All Personnel Page (if applicable)
- IRB/IACUC Approvals (if applicable)
- Other Support (if applicable)
NIH initiative to “Strengthen accountability, monitoring and oversight of closeout activities”

Three important NIH Guide Notices to reference:

NOT-OD-14-084
NOT-OD-14-093
NOT-OD-14-103
So what exactly does that mean.....

Domestic grants with a non-competing continuation year of funding in FY 2015 will shift from PMS G accounts to PMS P subaccounts.

This means we will no longer be doing a pooled draw down for reimbursement of expenses.

As of October 1, 2015 NIH will utilize only subaccounts for awarding grant funds.

NIH anticipates having completed the transition of all award mechanisms to PMS subaccounts by September 30, 2016.
So what exactly does that mean.....

Note: The project period end date will be changed to the budget period end date. This effectively breaks the single competitive segment into two shorter “administrative segments.”

• THIS CHANGE WILL BE REFLECTED IN THE COMMONS; HOWEVER, NIH WILL NOT ISSUE A REVISED NOTICE OF AWARD FOR THE FY 15 AWARD.
So timely close out is critical....

To prevent the loss of funds!

Grantees will be required to submit subaccount transitional FFR expenditure data that covers the project period from the original start date through the new project period end date. This will be due NO LATER THAN 90 days after the end of the calendar quarter in which the budget period ended.

FAILURE TO SUBMIT FFR EXPENDITURE DATA IN A TIMELY MANNER MAY AFFECT FUTURE FUNDING.
So timely close out is critical....

If the reports are not received on time, NIH will take unilateral action to close the award and may impose enforcement actions.

If an FFR goes in and it does not match the cash drawdowns from the PMS, NIH will close out the award and deactivate the account at the lower amount.