

party contractors. PSRC monitors compliance by requiring all contractors to sign our standard contract that includes terms and conditions requiring compliance with FTA requirements related to Title VI, DBE, conflict of interest, discrimination, lobbying, and debarment and suspension.

## **Subrecipient Monitoring**

February 2018

It is the policy of PSRC to monitor subrecipients of federal, state, and local grant funds to ensure that federal awards are used for authorized purposes in compliance with 2 CFR 200.331(a)(1), and to ensure the performance goals are achieved as described by the terms of the subaward.

### **Pre-Award**

Award agreements will include federal award information as well as necessary federal compliance information needed by subrecipients. A list of these requirements can be found at 2 CFR 200.331(a).

Prior to subaward, PSRC will conduct a risk assessment to evaluate subrecipient's risk of noncompliance by reviewing:

- The subrecipient's prior experience with the same or similar subawards,
- The results of previous audits including whether the subrecipient receives a Single Audit, and the extent to which the same or similar subaward has been previously audited,
- Whether the subrecipient has new personnel or new or substantially changed systems,
- The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency),
- Title VI compliance

PSRC will document the risk assessment and include it in the subrecipient file.

### **Post-Award**

Ongoing and annual monitoring will include the following:

- PSRC will ensure that all invoices submitted for payment from each subrecipient include adequate support for the costs incurred. Costs claimed as matching will be subject to the same standard as costs billed to PSRC.
- PSRC will review performance reports required by the subrecipient
- On-site reviews may be performed depending on assessed risk.
- Ensure subrecipient takes action on deficiencies in above areas or detected through audits or site reviews.
- Verify that subrecipient is audited when it is expected to expend federal awards exceeding \$750,000 per §200.501 Audit requirements.