

BEFORE THE BOARD OF COUNTY COMMISSIONERS

FOR COLUMBIA COUNTY, OREGON

In the Matter of Establishing a Subrecipient)
Monitoring Policy For Federal Grant Awards) Order No. 26-2016

WHEREAS, the Uniform Grant Guidance ("UGG"), 2 CFR Part 200; Section 200.331 requires the County to monitor subawards to ensure that subrecipients meet the UGG audit requirements and use funds in accordance with applicable laws, regulations, and terms of the federal award; and

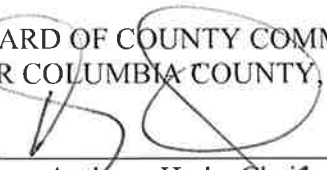
WHEREAS, subrecipient compliance must be carefully monitored; and

WHEREAS, it is in the best interest of the County to establish a policy for monitoring subrecipient compliance;

NOW, THEREFORE, IT IS HEREBY ORDERED, that all federally funded grants shall be managed in accordance with the Subrecipient Monitoring Policy which is attached hereto as Attachment "1" and is incorporated herein by this reference.

Dated this 22nd day of June, 2016.

BOARD OF COUNTY COMMISSIONERS
FOR COLUMBIA COUNTY, OREGON

By: 
Anthony Hyde, Chair

By: 
Henry Heimuller, Commissioner

By: 
Earl Fisher, Commissioner

Approved as to form

By: 
Office of County Counsel

Attachment "1"

Subrecipient Monitoring Policy

Policy Adoption Date: _____ Last Revision: _____

Purpose

The OMB Uniform Guidance, 2 CFR Part 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS (the Uniform Guidance) section 200.331 requires prime recipients of federal funds to monitor subawards to ensure subrecipients meet the audit requirements and use funds in accordance with applicable laws, regulations and terms of the award.

This policy applies to all subawards issued under both Federal and Non-Federal sponsored programs made to Columbia County (the County). This policy does not apply to professional services and consultant agreements or the procurement of goods or services from contractors.

Policy Statement

The County is responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure proper stewardship of sponsored funds. This policy addresses institutional responsibilities and assists Grant Managers and staff in ensuring that, in addition to achieving performance goals, subrecipients comply with Federal laws and regulations and with the provisions of any agreements that govern the subaward.

As a grant recipient of more than \$750,000 in federal funds per fiscal year, the County must ensure that its subrecipients comply with the Uniform Guidance. The County's responsibilities include:

- Evaluating subrecipient risk to determine the appropriate level of monitoring
- Ensuring that federal funds are used for authorized purposes in accordance with Federal statutes, regulations, and the terms and conditions of the subaward
- Reviewing financial and programmatic reports to ensure proper stewardship of sponsor funds
- Conducting on-going review of activities and overseeing subrecipient progress to ensure performance goals (scope of work or specific aims) are achieved

- Verifying that subrecipient is audited as required by audit requirements in Uniform Guidance

The County shall make a subrecipient risk assessment prior to contract.

Subrecipient monitorings shall be made on an annual cycle. Review of subrecipient audit reports and ensuring that subrecipients take appropriate and timely corrective action on any relevant findings is part of monitoring cycle.

Definitions

Contract – 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. 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.

Contractor – an entity that receives a contract as defined in *Contract* (see definition above).

Corrective Action – action taken by the auditee that: (a) corrects identified deficiencies; (b) produces recommended improvements; or (c) demonstrates that audit findings are either invalid or do not warrant auditee action.

Non-Federal entity – non-Federal entity means a state, local government, Indian tribe, institution of higher education (IHE), or nonprofit organization that carries out a Federal award as a recipient or subrecipient.

Pass through entity – a non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.

Subaward – 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.

Subrecipient – 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.

Subrecipient Monitoring – Activities undertaken to review the financial status and management controls of a subrecipient(s) to mitigate the risk of contracting with a subrecipient(s).