

## **St. Bonaventure University Subaward Policy**

### **Policy Statement**

St. Bonaventure University is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure proper stewardship of sponsor funds. The following policy applies to all subawards issued under sponsored programs made to St. Bonaventure University, without regard to the primary source of funding.

Noncompliance may result in the sponsor disallowing subaward costs, suspension or termination of the sponsored award, withholding other sponsored awards to the principal investigator (PI) or to St. Bonaventure University, and debarment of the PI or St. Bonaventure from receiving future sponsored awards. It is the responsibility of St. Bonaventure faculty and staff to ensure the university's compliance with this policy and procedure. The various terms of art contained in this document are defined in OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([2 CFR 200](#)) ("Uniform Guidance"), §200.1.

### **Policy Rationale**

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) ("Uniform Guidance"), specifically §200.332, requires pass-through entities to evaluate each subrecipient's risk of noncompliance in order to

- determine the appropriate monitoring level,
- monitor the activities of subrecipient organizations to ensure that the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward,
- and verify that subrecipients are audited as required by Subpart F of the Uniform Guidance.

For non-federal awards, St. Bonaventure University may also be required by the sponsor to provide evidence of due diligence in reviewing the ability of a subrecipient to properly meet the objectives of the subaward and account for the sponsor's funds.

Failure to adequately monitor the compliance of subrecipients could result in reputational damage to the university and schools within the university, and jeopardize current and future funding. It is the responsibility of St. Bonaventure University, as the pass-through entity, to ensure the good stewardship of sponsored funding. All funds assigned to subrecipient organizations should receive the same diligence as sponsored funds that remain at St. Bonaventure University.

The Grants Office will maintain documentation regarding ongoing risk analysis of subrecipients.

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