



Boston College  
OFFICE FOR SPONSORED PROGRAMS

Subrecipient Monitoring  
Policy and Procedures

Policy Statement

Boston College is responsible for the financial and programmatic monitoring of all subrecipient funds awarded to the college. The same level of responsibility and accountability is required for all funds whether from federal or non-

Office for Sponsored Programs (OSP) is responsible for the oversight of subrecipient monitoring and ensuring that Boston College's subrecipient monitoring procedures are compliant with federal and other applicable regulations. These responsibilities include:

- OSP is responsible for issuing agreements to the subrecipient applicable compliance requirements, including any appropriate flow down provisions from the prime agreement.
- Determining whether or not the subrecipient's PI's are debarred or suspended from receiving Federal funds.
- On an annual basis, OSP will review all active awards for which monitoring is mandated. of 6/16/18

staff, OSP and the subrecipient institution is essential to ensure a compliant and successful collaboration. Invoices should be reviewed to ensure proper use of sponsor funds and monitored for completeness. All invoices must be signed by the PI prior to submission to AP for payment. Documentation should be kept of all efforts related to subrecipient monitoring, especially if there are issues such as late billing or communication difficulty.

OSP shall review subrecipient annual Federal audit reports on an annual basis to verify that the subrecipient has completed