

HIGH RISK SUBRECIPIENT MONITORING POLICY

A subrecipient risk analysis is completed for each subrecipient using the information obtained in the Subrecipient Questionnaire. The risk analysis determines the level of risk associated with each subrecipient, and subsequently to the University of Alaska. A risk level is assigned to each subrecipient based on the score attained in response to the risk analysis questions. There are 4 levels of risk:

Low, 0-11 - No action necessary.

Medium, 12-50 - As appropriate, require detailed invoicing for subrecipient; as appropriate, seek guidance from PI, P&CS and/or OG&CA on complex contract or compliance issues.

High, 51-83 – As appropriate, seek guidance from PI, P&CS, OG&CA, Legal and/or Risk Management on complex contract or compliance issues and the additional monitoring that should be put in place such as more detailed invoices, more frequent/detailed financial and/or programmatic reporting, etc. including how and by whom the monitoring will be done.

Very High, >=84 - Monitoring and management discussions with PI, P&CS, OG&CA, Legal and Risk Management are required prior to issuance of a subaward.

If a subrecipient is found to be high risk, quarterly follow-ups are performed by the Contracts Manager. Each quarter, an email is sent to the department with a series of questions to determine if the subrecipient is performing in accordance with the terms and conditions of the subaward as follows:

- 1) Are deliverables and milestones progressing in accordance with the subaward?
- 2) Are invoices being submitted timely? and
- 3) Are there any other concerns that you have with this subrecipient?

This process is completed until all identified issues are resolved. Copies of all correspondence is retained in the official subaward file.