

Continuing Assessment Tool

Subrecipient Institution				
Internal Project Identifier				
Previously elevated risk?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Mgmt. plan in place?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Answers indicating a higher risk level should be explained in the Notes.

Yes No N/A

General Considerations:

- 1 Is either the Subrecipient Institution or its PI presently debarred or suspended? (SPA: SAM.GOV)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

- 2 Does the Subrecipient show "delinquent federal debt" or other problems in SAM or other federal sources? (SPA: SAM.GOV)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

Another SAM-related issue:

Per 2 CFR 25.110, a foreign entity may have previously been exempted from obtaining a unique entity identifier or registering in SAM if the award was less than \$25,000. If a modification causes the award to exceed \$25,000, this exemption may no longer apply.

For other federal sources, consider FAPIIS for example.

- 3 Are there concerns with respect to single audit? (OCGA)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

Have any of the following occurred:

- 1) failure to get an audit where required;
- 2) an audit finding in the subrecipient's file on this project (or any other project held by PTE); or
- 3) failure by subrecipient to take timely and appropriate corrective actions on audit findings?

- 4 Have any concerns been raised through monitoring, e.g. review of financial or performance reports? (DEPT & OCGA)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

Various factors may be considered in responding to this question, such as:

- Has the PI identified any non-compliance with meeting the milestones/deliverables of the Statement of Work?
 - Have invoices been submitted accurately, timely, and with allowable expenses?
 - If applicable, has the subrecipient taken timely and appropriate action on any known deficiencies detected through on-site reviews or other means?
- If non-compliance has occurred, the PTE may consider imposing additional conditions as described in 200.207.

- 5 Have other new concerns been identified? (DEPT)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

Examples include: concerning results from Federal monitoring; failure to comply with federal statutes/regulations or contract terms; and other programmatic or financial risks identified—or any other concerns impacting PTE's ability to comply. PTE may consider imposing specific conditions per 200.207. If further action is needed, describe in discussion section.

Project Specific Considerations:

- 6 A) Is cost-share included in the agreement?
B) If cost-share is included, is it being met/reported as specified? (DEPT)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

- 7 A) Is Participant Support included in the agreement?
B) If participant support is included, is it being invoiced correctly?
(DEPT & OCGA)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

Monitoring Plan Considerations:

- 8 Are additional requirements or specific subaward conditions imposed on the subrecipient?
If additional requirements or specific subaward conditions were ever imposed, did the subrecipient comply? (DEPT)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

The subaward may have necessitated additional conditions per 200.207 or for other reasons. If subrecipient demonstrated compliance, the PTE should consider removing special conditions per 200.207(d). If subrecipient is not compliant, 200.331(h) recommends that the PTE consider taking enforcement actions as described in 200.338.

- 9 Did the Subrecipient have required corrective action(s) that resulted from monitoring or audits? (DEPT)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

If corrective action was implemented, document it in discussion section. A resolved issue does not require additional action. If corrective action was not implemented, document in the discussion section what further action is needed.

Foreign & For-profit Subrecipient Considerations:

Note:

- 1) It is assumed that many decisions related to the for-profit or foreign nature of the subrecipients were made at the time of the initial risk assessment and setup of the award;
- 2) 2 CFR 200.501(h) places a special focus on for-profit subrecipients compliance and monitoring because such entities are not subject to Single Audits under this part. The same analysis would appear to apply to nearly all foreign subrecipients.

- 10 Has subrecipient's overhead or other rates changed materially? (DEPT)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

- 11 Have any financial concerns been identified? (DEPT)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

Examples include:

concerns with financial statements, audits, solvency, etc. or other entity changes, unique identifiers, etc.

- 12 Change current level of monitoring? (SPA)
If yes, explain in Notes.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

Assessment Performed:

Initials	Date

Assessment Incomplete