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Arecibo Observatory

Office of the Director

SUBJECT: Evaluation and Monitoring and Timely Actions for Instances of Non-Compliance	Effective Date: 04-30-2020	Policy Number: AO-POPE11
	Page 1	Of 3
	Responsible Authority: Director of the Arecibo Observatory	

DATE OF INITIAL ADOPTION AND EFFECTIVE DATE: April 30, 2020

APPLICABILITY/ACCOUNTABILITY

This policy applies to the subrecipients at the Arecibo Observatory.

GENERAL POLICY

The Arecibo Observatory will take reasonable steps to ensure that the compliance of the subrecipients is followed, including evaluation, monitoring and timely actions to detect any instances of non-compliance.

DEFINITIONS

Subrecipients: non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program.

POLICY STATEMENT

This policy is to be use in the efforts to promote compliance and pursue the timely, consistent and equitable resolution of an event of a non-compliance from the subrecipient. It also provides the framework and guidelines from which the subrecipient will have to go and follow through in the occurrence of a monitoring event.

The monitoring reinforce that the Arecibo Observatory management is watching and taking action when problems occur. The monitoring process helps to improve the accuracy of the process's accuracy, efficiency and effectiveness as it captures possible or actual failures. It also helps in documenting a process's existence, operation and oversight and in reporting on the process's outcomes can demonstrate the process works and is effective.

Monitoring helps management to affect changes when an activity does not meet or is at risk of not meeting its intended results. This means that the outcome of monitoring must be more than identifying actual or potential non-compliance; it must lead to management taking actions that correct the non-compliance risks. Knowing that it will report results of monitoring its activity also encourages the Arecibo Observatory Management to both monitor and make appropriate changes.

The intent is to develop, implement, maintain and improve monitoring practices that will provide effective oversight as efficiently as possible.

PROCEDURES

The steps to evaluating and monitoring and the timely actions for instances of non-compliance should include the following steps:

1. Outline a process.
2. Advice the subrecipient that a monitoring process will take place.
3. Initiate the monitoring process.
4. Develop terms of reference which areas need improvement.
5. Review documents submitted.
6. Response.
7. Review on site.
8. Determine if they are in compliance or not.
9. Corrective actions.
10. Mitigation process.
11. Final Report and send to NSF.

An audit to the subawardees will be schedule annually.

CONTACTS

Director of the Arecibo Observatory, ext. 212, 267

INITIATING AUTHORITY

Director of the Arecibo Observatory

POLICY APPROVAL

(For use by the Office of the Director)

Policy Number: AO-POPE11 Evaluation and Monitoring and Timely Actions for Instances of Non-Compliance

Initiating Authority: _____

Date: _____

Principal Investigator: _____

Date: _____