



Arecibo Observatory

Office of the Director

SUBJECT: Award Management Requirements	Effective Date: 04-30-2020	Policy Number: AO-POAM01
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	Responsible Authority: AO Administration	

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

APPLICABILITY/ACCOUNTABILITY

This policy applies to the Administration of the Arecibo Observatory.

GENERAL POLICY

Establish the minimum requirements for the management and monitoring of subawards during the life of the award.

DEFINITIONS

1. **Subaward:** Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a sponsored project received by the pass-through entity.
2. **Subrecipient:** Subrecipient means an entity that receives a subaward from a pass-through entity to carry out part of a sponsored program.
3. **Pass-through entity:** Pass-through entity (PTE) means an entity that provides a subaward to a subrecipient to carry out part of the sponsored program.

POLICY STATEMENT

The Arecibo Observatory (AO) will follow applicable institution, sponsoring agency, state, and federal guidelines in the ongoing monitoring and management of subawards to subrecipients. AO will utilize resources and standards provided by the Federal Demonstration Partnership (FDP) when possible. The 2CFR200 will serve as a guiding document for usual standards for subawards.

PROCEDURES

1. Any subaward at the Arecibo Observatory will be reviewed not less than annually by the Office of Research of the subawardee to insure ongoing eligibility and level of risk. This may be done at the time of modifications generated by incremental awards.

2. The current FDP Continuing Assessment Tool (see link below to FDP website) will be used by the subaward team for annual assessment.
3. Subrecipient invoices will be reviewed by the Principal Investigator (PI) for reasonableness, Arecibo Observatory Director, Business Manager for availability of funds, and subaward team for congruence with the subaward agreement. Invoices will be paid by the subawardee accounting department. Invoices will not be paid without review and authorization.
4. Modifications to existing subawards will be made at the request of the PI or PI delegate in accordance with the terms of the prime award as stated by the funding agency.
5. Subawards may be audited as deemed necessary to insure proper fiscal management of the sponsored award.
6. Subawards may be terminated for failure to perform, termination of the prime award, stop work orders by the sponsoring agency, or failure to meet the terms and conditions of the subaward agreement.
7. The Principal Investigator and the Arecibo Observatory Director are responsible for the conduct of the scope of work of the project and fiscal prudence of all aspects of the project. In order to assist both, the PI and AO Director in this responsibility, all actions pertinent to subaward management will be with made with the involvement of the PI.

CONTACTS

- Principal Investigator, ext. 212, 267
- Director of the Arecibo Observatory, ext. 212
- Business Operations Team, exts. 294, 219
- Business Manager, ext 325

REFERENCES

UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

<https://www.govinfo.gov/content/pkg/CFR-2014-title2-vol1/pdf/CFR-2014-title2-vol1-part200.pdf>

INITIATING AUTHORITY

Director of the Arecibo Observatory

POLICY APPROVAL	
(For use by the Office of the Director)	
Policy Number: AO-PO001	
Initiating Authority: _____	Date: _____
Principal Investigator: _____	Date: _____

