Processes for placing a subaward/subcontract with a foreign entity using sponsored funding

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**Background:**
“Subrecipient Monitoring” is a set of formal procedures established by the University for awarding and administering both foreign and domestic subawards. The task of Subrecipient Monitoring is shared by the project’s Principal Investigator (PI) and certain members of the Office of Sponsored Projects (OSP).

**Risk Assessment & Screening procedures:**
A comprehensive risk assessment is completed by OSP prior to issuing the subaward agreement. Elements of the review include inspection of the following:

- Subrecipient organization’s entity registration in [SAM.gov](https://www.sam.gov);
- Current F&A (Indirect cost) Rate Agreement;
- Audit, Financial Report(s) and/or Tax Returns; and
- A signed [Subrecipient Profile Questionnaire](https://www.sam.gov)

Screening of the subaward organization and subaward PI is performed by OSP through the Visual Compliance database to determine if there is any restriction on receiving federal funds or doing business with Brown. Additionally, the entity may be screened through FAPIIS (Federal Awardee Performance and Integrity Information System) which provides information about an organization’s past performance under federal awards.

**Contact for Questions:**
[OSP Staff](https://www.sam.gov) are available to investigate and assist entities which require guidance with completion of required documentation and to address any other concerns, such as currency exchange rates and payment terms.