OSP BRIEF 9/12/17

Agenda

1. Subs’ Single Audit Reports

2. Subs’ Audit Findings

3. Subs’ Invoices
What is a sub?
What is a sub?

• Sub = Subrecipient
• But what does that mean?

• What is the difference between the terms Subrecipient and Contractor?
Roles and Responsibilities
OSP – Annual Single Audit Review

• Annually review subs’ Single Audit (UG 200.331)

• If findings in audit, follow-up with sub to ensure corrective action taken

• Consider if adjustments to records is needed

• Issue Management Decision to the sub (UG 200.521)
Where to get more information?

- [www.cfo.gov/COFAR](http://www.cfo.gov/COFAR)
  - FAQs & webcasts

- [http://www.whitehouse.gov/omb/grants_docs](http://www.whitehouse.gov/omb/grants_docs)
  - crosswalks - side-by-side wording/text comparison of OMB Circulars to OMB UG

- [http://www.cogr.edu/](http://www.cogr.edu/)
  - COGR guides
Subs’ Single Audit Reports

• Questions

• Comments
Anatomy of an Audit Finding
(UG 200.516)

• Criteria or specific requirement on which finding is based
• Condition found, facts supporting deficiency
• Cause – why a difference between criteria and condition
• Effect – impact of difference
• Questioned Costs or known costs must be identified
• Recommendations to prevent future occurrences of deficiency
• View of responsible officials of the auditee
Example Finding:
Partners HealthCare System, Inc. and Affiliates

• Boston College has sub awards with:
  • MGH – Massachusetts General Hospital
  • BWH – Brigham and Women’s Hospital
Example Finding: PHC

- 2016-001 Unallowable Costs, Research and Development Cluster
Example Finding:
Moorehouse School of Medicine

• 2016-001 Reporting
Subs’ Audit Findings

- Questions
- Comments
Roles and Responsibilities
PI and Department

• PI monitors sub’s work
• PI reviews and approves/signs sub’s invoice; signature indicates sub is satisfactorily progressing
• PI/Dept. review invoice for appropriateness of costs
• PI/Dept. sends signed/approved sub invoice to Procurement for payment
Review of Sub’s Invoice

• Invoice lists detailed accounts / costs
• Invoiced costs are in the approved agreement budget
  – NO DEVIATIONS
• Recalculate invoice including fringe and F&A costs
• Total expenses for sub < total amount obligated to date
• Ensure costs are incurred during the correct budget period
• Ensure the following are on the sub’s invoice: BC project number; costs are in US dollars; dates of costs/services
• Ensure subs submit invoices timely especially near closeout
• If questions/concerns, discuss with sub (also OSP as needed)
• PI/Dept stamp - PI signature with date
Subs’ Invoices

• Questions

• Comments
Other Thoughts

OSP policies annual review and update