



BOSTON COLLEGE



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
 - FAQs & webcasts
- http://www.whitehouse.gov/omb/grants_docs
 - crosswalks - side-by-side wording/text comparison of OMB Circulars to OMB UG
- <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

The screenshot shows a web browser window displaying the Boston College Research at Boston College website. The page title is "Subcontracting" and the URL is "www.bc.edu/research/osp/subcontract.html". The page content includes a navigation menu, a search bar, and a list of links related to subcontracting. The left sidebar contains a menu for the Office for Sponsored Programs, with "Subcontracting" highlighted. The main content area lists various documents and forms, including "Subaward vs. Vendor", "Subaward Process", "Subaward Checklist", "Departmental Subaward Initiation Request Form", "Departmental Subaward Modification Request Form", "Subaward PO and Invoice Payment Guidance", "Subrecipient Commitment Form", "Subrecipient Monitoring Policy", and "Subrecipient Profile Questionnaire". A note at the bottom of the list states: "This page links to PDF files. Use this link to [download Adobe Reader](#) if needed."

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BC Subcontracting

www.bc.edu/research/osp/subcontract.html

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RESEARCH AT BOSTON COLLEGE

bc home > research > osp > subcontracting

Subcontracting

Subcontracting
Subaward vs. Vendor
Subaward Process
Subaward Checklist
Departmental Subaward Initiation Request Form
Departmental Subaward Modification Request Form
Subaward PO and Invoice Payment Guidance
Subrecipient Commitment Form
Subrecipient Monitoring Policy
Subrecipient Profile Questionnaire

This page links to PDF files. Use this link to [download Adobe Reader](#) if needed.

OFFICE FOR SPONSORED PROGRAMS

- PeopleSoft Financials 9.1 Contracts and Grants
- Assistance Documentation
- Forms
- Funding
- Federal Regulations
- Institutional Profile
- OSP Briefs and Trainings
- Research Policies
- Subcontracting**
- Staff and OSP Team Dept. Assignment
- OSP Annual Report