




OREGON DEPARTMENT OF FISH & WILDLIFE PROCEDURE Administrative Services Division

Title:	Federal Subaward/Contract Determination and Subaward Administration Procedure	ASD_232_PR
Supersedes:	n/a	
Applicability:	All ODFW employees; all Federal financial assistance awards	
Reference:	OAR 125, OAR 137, ORS 190, 279, 291, 496, 501, and 506, Oregon Constitution Article IX, ORS 30, Federal regulations (2 CFR 25, 2 CFR 200, 2 CFR 184, and FFATA Federal Funding Accountability and Transparency Act of 2006 Public Law 109-282) and Federal funding agreements	
Effective Date:	11/26/25	Approved: 

I. PURPOSE

To outline the procedure ODFW employees use to implement the Federal requirements of [2 CFR 200](#) and other applicable Federal regulations in determining Subawards vs. Contracts and managing and monitoring Federal Subaward agreements to ensure the proper stewardship of Federal funds.

II. DEFINITIONS

Capital Assets means tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with General Accepted Accounting Principles (GAAP) ([2 CFR 200.1](#)). Capital assets include:

- A. Land, buildings (facilities), equipment, and intellectual property (including software), whether acquired by purchase, construction, manufacture, exchange, or through a lease; and
- B. Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance).

Cooperative Agreement means, for the purposes of this policy, a legal instrument of financial assistance between a Federal agency and a Recipient OR between a Pass-Through Entity and Subrecipient that:

- A. Is used to enter into a relationship the principal purpose of which is to transfer anything of value to carry out a public purpose authorized by a law of the United States; and not to acquire property or services for the Federal Government or pass-through entity's direct benefit or use;

- B. Is distinguished from a grant in that it provides for substantial involvement of the Federal agency or Pass-Through Entity in carrying out the activity contemplated by the Federal Award. (See [2 CFR 200.1](#))

Contract means, for the purpose of this policy which involves Federal financial assistance, a legal instrument by which ODFW conducts procurement transactions under a Federal Award. (See [2 CFR 200.1](#)). Note: For the purposes of this policy, “Contract” does not include Grant agreement or Subaward agreement.

Contract Authority means the ODFW employee with authority to sign contracts, usually Chief Operating Officer. See [ASD 230 PO](#).

Contract Services means the work unit in ODFW’s Administrative Services Division.

Contract Services Request (CSR) means the online form used to request services from ODFW’s Contract Services work unit.

Contract Specialist for Federal Award means the ODFW employee in Contract Services who is responsible for processing the incoming federal award in the PIE system.

Contract Specialist for Subaward means the ODFW employee in Contract Services who is responsible for processing the Subaward agreement.

Contractor means the entity with which ODFW enters into a Contract.

Federal Award (or Federal Grant) means federal financial assistance that a Recipient receives directly from a federal agency or indirectly from a Pass-Through Entity (see [2 CFR 200.1](#)). It does not include federal funding through a federal contract (a contract in which the federal government is procuring Goods or Services for its use).

Goods means:

- A. Equipment (tangible personal property having a useful life of more than one year and a per-unit acquisition cost >\$10,000);
- B. Supplies (all tangible personal property other than equipment);
- C. Materials; and
- D. Any personal property, including any tangible, intangible, and intellectual property and rights and licenses that ODFW is authorized by law to procure.

Grant is defined in [ORS 279A.010](#) and means:

- A. A Contract under which ODFW receives money, property, or other assistance, from a grantor for the purpose of supporting or stimulating a program or activity of ODFW; or
- B. A Contract under which ODFW provides money, property, or other assistance, to a recipient for the purpose of supporting or stimulating a program or activity of the Recipient.

Grants Accountant means the ODFW employee in Fiscal Services, Administrative Services Division who is responsible for processing financial reports for incoming Federal Awards.

Indirect Cost Rate means the ratio of an entity's total indirect costs (costs incurred for a common or joint purpose benefitting more than one objective) to its direct costs. The agency negotiates a rate annually with the federal government. Examples of indirect costs include administrative services, utilities, and infrastructure.

Journal Voucher means a document used to record financial transactions such as adjustments and corrections.

Pass-Through Entity means a recipient or subrecipient that provides a Subaward to a Subrecipient (including lower tier Subrecipients) to carry out part of a federal program. The authority of the Pass-Through Entity under this part flows through the Subaward agreement between the Pass-Through Entity and Subrecipient ([2 CFR 200.1](#)). The Pass-Through Entity for the purposes of this policy is ODFW.

Procurement File means an official file for a Contract, procurement, or Grant agreement maintained by Contract Services, containing documents related to the preparation, execution, amendment, and close out of the agreement. The file does not contain the Project Manager for Subaward's selection, monitoring, or administration documents.

Procurement Information Exchange (PIE) system means the ODFW system that tracks incoming funding.

Project Manager for Contract means the ODFW employee with responsibility for a Contract, including Contract administration actions (i.e., authorizing the performance of work, evaluating the Contractor's performance, approval of invoices for payment, requesting Contract Amendments, etc.). Also called the "contract administrator" or "authorized representative." It is the ODFW employee designated on the Contract Services Request for the Contract or a successor to the Project Manager.

Project Manager for Federal Award means the ODFW employee with responsibility for the budget and administration of the Federal Award. This is the ODFW employee designated in the PIE system or a successor to the Project Manager. Also may be called "Grantee Project Director" in federal documents. This may be a different employee from the Project Manager for Subaward.

Project Manager for Subaward means the ODFW employee with responsibility for monitoring the activities of a Subrecipient to ensure compliance with the Subaward. This is the ODFW employee designated on the Contract Services Request (CSR) for the Subaward or a successor to the Project Manager. Also may be called "Project Leader" in federal documents.

Services means the furnishing of labor, time, or specialized expertise.

Single Audit means an audit required by the federal government of a non-federal entity that expends \$1,000,000 or more during the non-Federal entity's fiscal year in Federal Awards. See [2 CFR 200 Subpart E](#).

Spending Authority means ODFW employee who has the authority to commit funds on behalf of ODFW (for a specific cost code).

Subaward ("subgrant") means an award provided by a Pass-Through Entity (e.g., ODFW) to a Subrecipient for the Subrecipient to contribute to the goals and objectives of the project by carrying out part of a Federal award received by the Pass-Through Entity. It does not include payments to a Contractor, beneficiary, or participant ([2 CFR 200.1](#)).

Subaward File means an official file for a Subaward maintained by the Project Manager for Subaward, containing documents related to determination of Subrecipient, and monitoring and administration of the Subaward (e.g., requests for reimbursement, correspondence with Subrecipient, monitoring activity records).

Subrecipient means an entity that receives a Subaward from a Pass-Through Entity (e.g., ODFW) to carry out part of a Federal Award ([2 CFR 200.1](#)).

Transmittal means an internal document that notifies Accounts Payable of a need for a payment on an agreement.

Unique Entity Identifier (UEI) means the Federal government-provided ID number that is used to identify entities eligible for Federal funds, available through Federal System for Award Management website ([sam.gov](#)). Previously called Data Universal Numbering System (DUNS) number.

III. PROCEDURE

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Key:

Contract Authority (usually Chief Operating Officer)
Contract Specialist for Federal Award (Contract Services)
Contract Specialist for Subaward (Contract Services)
Grants Accountant (Fiscal Services)
Procurement and Contract Assistant (Contract Services)
Project Manager for Federal Award
Project Manager for Subaward
Spending Authority for Subaward Cost Code
Staff Accountant (Fiscal Services)

A. Subrecipient/Contractor Determination (before Federal Award)

Role	Step	Responsibilities
Project Manager for Federal Award	1	<p>a. Using the rationale outlined in policy ASD_232_PO, determine whether the entity receiving Federal funds from ODFW is a Subrecipient or a Contractor.</p> <ul style="list-style-type: none"> i. If the entity is determined to be a Contractor*, this use of funds shall be considered a procurement, and selection of a Contractor shall proceed as per public procurement law, rules, and Contracting policy ASD_230_PO. ii. If the entity is determined to be a Subrecipient*, the relationship shall be established using a Subaward (“subgrant”) agreement to facilitate the transfer of funds as per policy ASD_232_PO and this procedure. iii. * “Gray area” entities: If ODFW will have substantial involvement and is planning to enter into a Cooperative Agreement <u>OR</u> if due to the unique nature of the relationship the entity appears to exhibit the characteristics of both a Contractor and a Subrecipient, determine the nature of the relationship using the Subrecipient vs. Contractor Determination Form. Consult with the planned Project Manager for Subaward or Contract if unsure. <p>b. Document the determination as follows:</p> <ul style="list-style-type: none"> i. Submit PIE request for Federal grant.¹ When preparing the ODFW PIE budget template, enter the Contract or Subaward details in the appropriate subsection of the budget: <ul style="list-style-type: none"> 1. For Goods to be procured, enter the details in the PIE budget, Equipment or Supplies section, as per the instructions. 2. For Contracts or Subawards, enter the appropriate details in the appropriate subsection of the Contracts and Subawards section. ii. Specify the determination for each Contract or Subaward in the budget narrative of the Federal Award application. iii. Save the Subrecipient vs. Contractor Determination Form, if applicable, in the Federal Award File and provide to the Project Manager for Subaward to save in the Subaward File (or to the Project Manager for Contract to save in the Procurement File).

¹ For competitive federal funding opportunities, follow the additional application procedures at <https://stateoforegon.sharepoint.com/sites/ODFW-ServiceandSolutionPortal/SitePages/Competitive%20Federal%20Funds.aspx?csf=1&web=1&c=fjAJM&CID=638350a2-b88b-4d89-aa2d-2e53ae161c90>. Provide the completed PIE budget to the Competitive Federal Application Submitter for review.

A. Subrecipient/Contractor Determination (before Federal Award), continued

Role	Step	Responsibilities
Project Manager for Subaward or Project Manager for Contract	2	<ul style="list-style-type: none"> a. If a Contract, comply with the requirements in Contracting Policy ASD_230_PO and Contract Administration policy ASD_231_PO. <i>End of Contract guidance in this procedure.</i> b. If a Subaward, continue below.

B. Subrecipient Selection, Risk Assessment, Monitoring Plan, and Subaward Agreement Development

Role	Step	Responsibilities
Project Manager for Subaward	1	<ul style="list-style-type: none"> a. Create Subaward file for all documentation related to Subaward selection, monitoring, payment approval, and closeout. The file shall be in a file location accessible to the Project Manager’s supervisor and Project Manager for the Federal Award and available for audits/compliance as needed. (See 2 CFR 200.334.) b. Ensure Subrecipient is selected in compliance with Federal and state regulations and ODFW program rules or guidelines. c. Subrecipient Controls Questionnaire: Ask the Subrecipient to complete this questionnaire and return to you. You will use this to complete the Subrecipient Risk Assessment and Monitoring Plan. Please note the following fields on the questionnaire: <ul style="list-style-type: none"> i. Unique Entity Identifier (UEI): Subrecipients are required to obtain a UEI in sam.gov prior to receiving a Subaward. (See 2 CFR 25.300.)² ii. Indirect Cost Rate: If a Subrecipient is using a federally approved Indirect Cost Rate, request documentation at pre-award and annually during the life of the agreement. If the entity chooses to use the <i>de minimis</i> rate, the entity must elect this during pre-award. If <i>de minimis</i>, no further documentation is needed throughout the life of the agreement. (See 2 CFR 200.332(4) for instructions on indirect cost rate if Subrecipient does not have a federally approved Indirect Cost Rate.)

² Subrecipients can either obtain only a UEI or fully register their entity on sam.gov. For instructions on both, see sam.gov Knowledge Article [“What’s the difference between only getting a Unique Entity ID \(UEI\) and registering your entity?”](#) Individuals who receive an award as a “natural person” (unrelated to any business or nonprofit organization an individual owns or operates) are not required to get a UEI as per [2 CFR 25.105](#).

B. Subrecipient Selection, Risk Assessment, Monitoring Plan, and Subaward Agreement Development, continued

Role	Step	Responsibilities
Project Manager for Subaward	1 (cont)	<p>d. Complete the following:</p> <ul style="list-style-type: none"> i. Detailed Project Description (also called Statement of Work or Program Description) for Subaward agreement (see template). ii. For programs with DOJ-approved Subaward agreement template: complete as much of your program’s Subaward agreement template as possible or arrange with Contract Services to complete. iii. Federal Financial Assistance Subrecipient Risk Assessment and Monitoring Plan. Complete this form using the responses from the Subrecipient Controls Questionnaire. (Complete Categories 1 and 2 to the best of your ability; a Staff Accountant will review these as well.) <p>e. Submit a Contract Services Request (CSR) for Subaward agreement. Attach:</p> <ul style="list-style-type: none"> i. Subrecipient Controls Questionnaire. ii. Federal Financial Assistance Subrecipient Risk Assessment and Monitoring Plan. iii. Project Description (Statement of Work). iv. Subaward agreement template (if applicable).
Procurement and Contract Assistant	2	<p>a. Review CSR for Subaward Agreement. Ensure Subrecipient Controls Questionnaire, Federal Financial Assistance Subrecipient Risk Assessment and Monitoring Plan, and Scope of Work are included. If not, request from Project Manager for Subaward.</p> <p>b. Once CSR is complete, assign CSR to a Contract Specialist; this will trigger system notification for Staff Accountant to perform Subrecipient Risk Assessment (Step 4).</p>
Contract Specialist for Subaward	3	<p>a. Receive CSR. Create Subaward Procurement File for all documents related to the Subaward agreement.</p> <p>b. Confirm funding availability; review related terms and conditions in PIE.</p> <ul style="list-style-type: none"> i. If Subaward was not listed in the original PIE budget, or if Subaward appears to be a Contract, work with Project Manager for Subaward and Project Manager for Federal Award to determine whether a modification is needed to the original Federal Award based on its terms. Determine whether a Subrecipient vs. Contractor Determination Form is needed. ii. If appropriate document is determined to be a Contract instead of a Subaward, notify Staff Accountant that Subrecipient Risk Assessment is not necessary.

B. Subrecipient Selection, Risk Assessment, Monitoring Plan, and Subaward Agreement Development, continued

Role	Step	Responsibilities
Staff Accountant	4	<ul style="list-style-type: none"> a. Receive system notification of need for Federal Financial Assistance Subrecipient Risk Assessment. b. Review Federal Financial Assistance Subrecipient Risk Assessment Categories 1 and 2 to confirm the risk determination, using information from CSR, Subrecipient Controls Questionnaire, Single Audit (if applicable), and other sources. Update if needed. c. Email completed Federal Financial Assistance Subrecipient Risk Assessment to Project Manager and Contract Specialist for Subaward.
Project Manager for Subaward	5	<ul style="list-style-type: none"> a. Complete Subrecipient Monitoring Plan (Section 2 of Federal Financial Assistance Subrecipient Risk Assessment and Monitoring Plan) based on risk level determined in risk assessment. b. If appropriate and based on risk, consider implementing specific conditions in the Subaward as described in 2 CFR 200.208, and work with Contract Specialist to notify the Federal agency and Subrecipient of the specific conditions. (See also 2 CFR 200.332(d)). c. Email completed Federal Financial Assistance Subrecipient Risk Assessment and Monitoring Plan form to Contract Specialist for Subaward.
Contract Specialist for Subaward	6	<ul style="list-style-type: none"> a. Receive Federal Financial Assistance Subrecipient Risk Assessment and Monitoring Plan. b. Ensure Federal Financial Assistance Subrecipient Risk Assessment and Monitoring Plan Form is complete (required for execution of Subaward). Add any required additional conditions identified in the monitoring plan into the Subaward agreement. c. Assess the risk level of and required insurance for the Subaward agreement using the Department of Administrative Services (DAS) Risk Assessment Tool for Grants. (Note that this is not the same as the Federal Financial Assistance Subrecipient Risk Assessment form.) Include insurance requirements in the Subaward agreement. You may provide insurance exhibit ahead of time to allow Subrecipient time to procure required insurance. d. Verify that the Subrecipient is not excluded or disqualified from receiving a Federal Award in sam.gov, or include ODFW Debarment and Suspension Certification Form if Subaward is \$25,000 or above. (See 2 CFR 180.300; 2 CFR 200.332.)

B. Subrecipient Selection, Risk Assessment, Monitoring Plan, and Subaward Agreement Development, continued

Role	Step	Responsibilities
Contract Specialist for Subaward	6 (<u>cont</u>)	<p>e. If not included with the CSR, develop Subaward agreement using the current, appropriate Department of Justice (DOJ)-approved Subaward template and in accordance with state and Federal law. Include the Federal Funding Accountability and Transparency Act (FFATA) Data Collection Form Exhibit if Subaward is \$30,000 or above and is not awarded to an individual. (2 CFR 170 Appendix A).</p> <p>f. Send Subaward agreement to Project Manager for Subaward review.</p>
Project Manager for Subaward	7	<p>a. Review and request modifications to Subaward agreement as necessary; approve Subaward agreement.</p> <p>b. Note: Some Project Managers for Subaward perform Steps #8.a and 8.b below after confirming with Contract Specialist for Subaward.</p>
Contract Specialist for Subaward	8	<p>a. When required, submit Subaward agreement to DOJ for legal sufficiency approval. Receive approval.</p> <p>b. Distribute Subaward agreement for Subrecipient review and signature. Request certificate of insurance and W-9 from Subrecipient.</p> <p>c. Receive Subaward agreement and other requested documents from Subrecipient. Provide W-9 to appropriate Accounts Payable technician.</p> <p>d. Confirm Subrecipient insurance coverage, signature, and completed forms. Request additional information if necessary.</p> <p>e. Send agreement to Contract Authority for signature.</p>
Contract Authority	9	<p>a. Review and sign Subaward agreement and return to Contract Specialist for Subaward.</p>
Contract Specialist for Subaward	10	<p>c. Provide fully signed Subaward agreement to Subrecipient and Project Manager for Subaward. (Not required to be posted to OregonBuys).</p>
Project Manager for Subaward	11	<p>a. Receive Contract Services' system-generated message with Transmittal instructions.</p> <p>b. Submit fully signed Subaward agreement and set-up Transmittal to Accounts Payable.</p>

B. Subrecipient Selection, Risk Assessment, Monitoring Plan, and Subaward Agreement Development, continued

Role	Step	Responsibilities
Procurement and Contract Assistant	12	<ul style="list-style-type: none"> a. Receive Contract Services’ system-generated message notifying of potential need for FFATA report. b. For any Subaward greater than or equal to \$30,000 and that is not awarded to an individual, file a FFATA Subaward report by the end of the month following the month in which ODFW executes the Subaward agreement (see 2 CFR 170). <ul style="list-style-type: none"> i. Log into sam.gov. ii. Using the Federal Award information from the Subaward agreement, select the Prime Award Details. iii. Using the Data Collection Exhibit from the Subaward agreement, enter the Subawardee (Subrecipient) Information. iv. Submit report. v. Save record of FFATA report in Subaward Procurement File.

C. Subaward Monitoring and Reporting

These responsibilities are completed throughout the life of the subaward and may be completed concurrently.

Role	Responsibilities
Project Manager for Subaward	<ul style="list-style-type: none"> a. Monitoring Activities Documentation. Monitor programmatic, administrative, and financial activities of the Subrecipient to ensure proper stewardship of Federal funds as per the Monitoring Plan. (See 2 CFR 200.332.) <ul style="list-style-type: none"> i. Communicate regularly with subrecipient. ii. Using the Subaward Monitoring Record or similar document, document all monitoring activities you conduct as per the Monitoring Plan (e.g., correspondence, visits, desk reviews). b. Invoice review. Review invoices to ensure the invoices are timely and the costs are reasonable, necessary, and eligible under the Federal Award and contain the appropriate backup documentation to support the expense. For any questionable expense(s), request additional backup from the subrecipient specific to the charge(s) prior to payment. Document approval of invoices. <ul style="list-style-type: none"> i. Track invoices against the remaining Subaward amount after expenses to ensure the rate of spend is consistent with the timeline of the project. ii. Submit Transmittals to Spending Authority for approval, then submit to Accounts Payable with documentation of expense.

C. Subaward Monitoring and Reporting, continued

Role	Responsibilities
Project Manager for Subaward	<p>c. Reports.</p> <ul style="list-style-type: none"> i. Review the Subrecipient’s financial and performance reports required by the Subaward agreement. Document receipt in the Subaward Monitoring Record. ii. Complete and submit Progress Reports according to original Federal Award terms, or provide information to Project Manager for Federal Award for reporting. <p>d. Capital Asset. If the Subaward was used to acquire or construct a Capital Asset, monitor the appropriate use of the asset throughout its life.</p> <p>e. Annual Single Audit Review: Once a year during the life of the Subaward, ask the Subrecipient if they have expended more than \$1,000,000 in Federal funds from any source during the last fiscal year. (Federal entities are exempt from this requirement.) If so, the Subrecipient is required to provide a copy of their current Single Audit. It may be also available on the Federal Audit Clearinghouse website. Provide the audit to Staff Accountant for review.</p> <ul style="list-style-type: none"> i. Receive information from Staff Accountant about the annual Single Audit review, if applicable. ii. If the Staff Accountant reports that are significant findings <u>related to the Subaward with ODFW</u>, work with Staff Accountant and Contract Specialist to issue a letter to Subrecipient requesting information on the findings. Provide a deadline by which Subrecipient is to respond. iii. Review Subrecipient’s response to Single Audit inquiry. iv. Work with Contract Specialist and Staff Accountant to issue a formal management decision (limited to the findings related to the Subaward with ODFW) to the Subrecipient. A decision notice must be issued within six months of ODFW’s acceptance of the audit report (see 2 CFR 200.521(d)). <p>f. Indirect Cost Rate. If an entity is using a Federally approved Indirect Cost Rate, request documentation of the approved rate annually during the life of the agreement. (See 2 CFR 200.332(b)(xiv).)</p> <p>g. Breach. In the case of a breach or possible breach of the terms or conditions of the Subaward agreement, document the issue on the Subaward Monitoring Record template. Contact the Contract Specialist prior to taking official action. Consider taking enforcement action against noncompliant Subrecipients as per 2 CFR 200.339 and program regulations. Follow up and ensure action on identified deficiencies.</p>

C. Subaward Monitoring and Reporting, continued

Role	Responsibilities
Staff Accountant (Fiscal Services)	<p>a. Annual Single Audit Review. Receive from Project Manager for Subaward annual Single Audit from Subrecipients with active Subawards that have expended more than \$1,000,000 in Federal Funds from any source during the last fiscal year. Review the Subrecipient’s Single Audit to ensure Subrecipient has no internal control deficiencies related to Subaward with ODFW (as per 2 CFR 200.332(e)(3)).</p> <p>i. Inform Contract Specialist and Project Manager for Subaward about whether there are significant findings identified on the Single Audit related to the Subaward with ODFW.</p> <p>ii. If there are significant findings related to the Subaward with ODFW, work with Contract Specialist and Project Manager for Subaward to 1) issue a letter to Subrecipient requesting information on the findings identified in the Single Audit, 2) review Subrecipient’s response, and 3) issue a formal management decision (see 2 CFR 200.521).</p>
Contract Specialist for Subaward	<p>a. If there are significant findings in an annual Single Audit related to the Subaward with ODFW (see above), work with Staff Accountant and Project Manager to 1) issue a letter to Subrecipient requesting information on the findings identified in the Single Audit, 2) review Subrecipient’s response, and 3) issue a formal management decision (see 2 CFR 200.521).</p>
Spending Authority for Subaward Cost Code	<p>a. Approve Transmittals for payment.</p>
Project Manager for Federal Award	<p>a. Manage budget and administration of the Federal Award.</p> <p>b. For Federal Awards with multiple Subawards, collect Progress Reports and submit to Federal agency.</p>
Grants Accountant	<p>a. Complete and submit Financial Reports for incoming Federal Award, including financial data related to relevant Subawards.</p>

D. Subaward Agreement Amendments

Role	Step	Responsibilities
Project Manager for Subaward	1	<ul style="list-style-type: none"> a. If there are scope, budget, or period of performance changes during Subaward activities, work with the Subrecipient to identify the specific changes (amendment) needed to the Subaward agreement. b. Work with Project Manager for Federal Award and Contract Services to determine modifications needed to Federal Award, if any.
Project Manager for Federal Award	2	<ul style="list-style-type: none"> a. If required by Federal Award terms, contact Federal agency for the Award for approval of modification b. Submit PIE request for modification. (Processed according to standard PIE process.)
Project Manager for Subaward	3	<ul style="list-style-type: none"> a. Submit Contract Services Request for Subaward amendment.
Contract Specialist for Subaward	4	<ul style="list-style-type: none"> a. Receive and review Contract Services Request for amendment. Confirm funding availability and related terms and conditions. b. Develop and finalize amendment on appropriate DOJ-approved template.
Project Manager for Subaward	5	<ul style="list-style-type: none"> a. Review and approve Subaward agreement amendment. b. Note: Some Project Managers for Subaward perform Steps #6.a and 6.b below after confirming with Contract Specialist for Subaward.
Contract Specialist for Subaward	6	<ul style="list-style-type: none"> a. When required, send amendment to DOJ for legal sufficiency review. Receive approval. b. Distribute amendment for Subrecipient review and request signature and updated insurance certificate. c. Receive Subaward agreement and other requested documents from Subrecipient. d. Confirm Subrecipient insurance coverage, signature, and completed forms. Request additional information if necessary. e. Send agreement to Contract Authority for signature.
Contract Authority	7	<ul style="list-style-type: none"> a. Review and sign amendment.
Contract Specialist for Subaward	8	<ul style="list-style-type: none"> a. Provide fully signed amendment to Project Manager for Subaward and Subrecipient. (Not required to be posted to OregonBuys). Mark as “Complete” in tracker.
Project Manager for Subaward	9	<ul style="list-style-type: none"> a. Receive system-generated message reminding of need for updated Transmittal reflecting amendment changes. Submit amendment Transmittal to Accounts Payable.

D. Subaward Agreement Amendments, continued

Procurement and Contract Assistant	10	<ul style="list-style-type: none"> a. Receive Contract Services’ system-generated message notifying of potential need for FFATA report. b. Upon receipt of notification of Subaward amendment, review the total funding awarded to the Subrecipient under the Federal Award. <ul style="list-style-type: none"> i. If total of original Subaward and all amendments is still under \$30,000, or if the Subrecipient is an individual, no action is needed. ii. If funds are added to the Subaward and it takes the award over the \$30,000 threshold, the Subaward must be reported at that time. iii. If funds are being added to a Subaward that is already over the \$30,000 threshold, update the FFATA reporting to reflect the increase. c. Save a record of updated FFATA report in Subaward Procurement File.
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E. Subaward Closeout

Role	Step	Responsibilities
Project Manager for Subaward	1	<ul style="list-style-type: none"> a. Receive reports as required from Subrecipient. Once work has been completed and reports are received, check the budget and complete any Journal Vouchers (JVs) before fiscal reports are submitted for closeout. b. When all administrative actions and required work of the Federal Award have been completed, close out the award (see 2 CFR 200.344). <ul style="list-style-type: none"> i. Have Subrecipient fill out, sign, and return the Subaward Close Out Form. ii. Countersign and return to Contract Specialist for Subaward Procurement File
Project Manager for Subaward <i>(or Project Manager for Federal Award if award is larger than Subaward scope)</i>	2	<ul style="list-style-type: none"> a. Submit, no later than 120 calendar days after the end date of the period of performance (or earlier as required by Award terms and conditions), all performance, and other reports as required by the terms and conditions of the Federal Award.
Grants Accountant	4	<ul style="list-style-type: none"> a. Submit, no later than 120 calendar days after the end date of the period of performance (or earlier as required by Award terms and conditions), all financial reports as required by the terms and conditions of the Federal Award.
Project Manager for Subaward	5	<ul style="list-style-type: none"> a. EXCEPTION: If the Subaward was used to acquire or construct a Capital Asset, monitor the appropriate use of the asset throughout its life. See ASD_210_PO Asset Management Policy.

F. Documentation Requirements

Role	Responsibilities
Project Manager for Subaward	<ul style="list-style-type: none"> a. Maintain a Project Manager Subaward file for each Subaward (see 2 CFR 200.334) accessible to at least the Project Manager’s supervisor. The file shall contain records related to monitoring progress and financials. The file shall contain at a minimum: <ul style="list-style-type: none"> i. Subrecipient/Contractor Determination Form, if applicable. ii. Federal Financial Assistance Subrecipient Risk Assessment and Monitoring Plan Form and all documentation related to monitoring Subrecipient compliance. iii. Financial records, including Subrecipient invoices or requests for reimbursement; Build America, Buy America compliance documentation; program income documentation (if applicable); match documentation; and all fully signed Transmittals of payments. iv. Subrecipient Progress and Final Performance Reports. v. All Subaward permits, ESA compliance, NHPA compliance. vi. All post-award commitments (e.g., MOU/MOA, maintenance agreements). vii. Site visit photos and notes from during sub-award and post-award if monitoring for a useful life on a construction project. viii. Maintain the records for the longer of the retention requirements in 2 CFR 200.334, the Federal Award, or Oregon General Records Retention Schedule OAR 166-300-0025 (28).
Grants Accountant	<ul style="list-style-type: none"> a. Maintain a fiscal Subaward file with Subrecipient Progress and Final Fiscal Reports. b. Maintain the records for the longer of the retention requirements in 2 CFR 200.334, the Federal Award, or Oregon General Records Retention Schedule OAR 166-300-0025 (28).
Contract Specialist for Subaward	<ul style="list-style-type: none"> a. Maintain a Procurement File for each Subaward as per 2 CFR 200.334. The file shall contain records related to the Subaward agreement as per OAR 125-246-0556 Procurement Files requirements and the Federal Award. <ul style="list-style-type: none"> i. The record of the actions used to develop the agreement ii. Executed Subaward agreement and amendments iii. The record of actions used to administer the agreement, including correspondence from DOJ iv. Record of the Contract Administrator (Project Manager) b. Maintain the records for the longer of the retention requirements in 2 CFR 200.334, the Federal Award, or Oregon General Records Retention Schedule OAR 166-300-0025 (28).

F. Documentation Requirements, continued

Contract Services	<ul style="list-style-type: none">a. Maintain the following form templates:<ul style="list-style-type: none">i. Subrecipient vs. Contractor Determination Formii. Subrecipient Controls Questionnaireiii. Federal Financial Assistance Subrecipient Risk Assessment and Monitoring Plan Formiv. Subaward Agreementv. Subaward Monitoring Recordvi. Subaward Closeout Form
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