

**Renaissance Academy
Charter School**

Grant Subrecipient Monitoring Procedures – Federal Programs

In the event a Charter School disburses federal funds received through a federal award to other entities and assigns responsibilities to the outside entity to conduct a portion of the work, the School shall be responsible for determining, on a case-by-case basis, whether the agreement with such entity places the outside entity in the role of a subrecipient receiving a subaward of federal funding, or the role of a contractor.

If the Charter School grants sub awards of federal funding to other entities as sub recipients, the School shall be responsible for:

1. Evaluating the entity for risk of noncompliance to determine appropriate monitoring practices.
2. Monitoring the sub recipient entity's implementation to ensure compliance with federal, state and local laws, conditions of the federal funding award, and Board Policy and procedures.
3. Notifying the subrecipient entity of identified deficiencies found during the monitoring process and ensuring that identified deficiencies are corrected.
4. Documenting and retaining records on sub recipient identification, notification, evaluation, monitoring and corrective actions taken.

Definitions

For purposes of policies and procedures related to federal programs, the following definitions shall apply:

Contract

A legal instrument by which a non-federal entity purchases property or services needed to carry out the project or program under a federal award. The term as used here does not include a legal instrument, even if the entity considers it a contract, when the substance of the transaction meets the definition of a federal program award or subaward (2 CFR 200.220)

Contractor

An entity that receives a contract, as defined in law and regulations, by which a non-federal entity purchases property or services needed to carry out the project or program under a federal award. (2 CFR 200.230)

Pass-through entity

A non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program. The district services as a pass-through entity in cases where it awards federal funding to a subrecipient as defined in the procedure. (2 CFR 200.740)

Sub Award

An award provided by a pass-through entity to a sub recipient in order to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract. **(2 CFR 200.92)**