



## PROCEDURAL STATEMENT

**Procedural Statement Title:** Subrecipient Monitoring: Invoice Approval and Approval Delegation

**Functional Area:** Research Administration

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<b>Related Policy:</b>	2 CFR 200 Subpart D: Subrecipient Monitoring and Management
<b>Effective Date:</b>	May 16, 2025
<b>Approved by:</b>	Alexa Van Dalsem
<b>Responsible Offices:</b>	Office of Contracts and Grants
<b>Procedural Statement Contact:</b>	J Butler, Assistant Director, Subcontracts, Office of Contracts and Grants
<b>Last Reviewed/Updated:</b>	April 30, 2025

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### I. PROCEDURAL STATEMENT

Subrecipient Monitoring, required by federal regulations, includes the activities undertaken by University of Colorado Boulder (CU Boulder) to review subrecipient's completion of a scope of work and financial oversight of funds awarded to a subrecipient. As part of Subrecipient Monitoring, CU Boulder Principal Investigators (PI) are required to review and approve all Subrecipient invoices, unless that responsibility is delegated by the PI to another person.

This Procedural Statement provides a consistent process for documenting subrecipient invoice approval and delegation of invoice approval authority across CU Boulder as part of the University's subrecipient monitoring activities.

### II. DEFINITIONS

**Blanket Purchase Order (BPO):** Blanket purchase orders are purchase orders that require recurring orders and/or multiple payments over a defined period. BPOs are the mechanism used to distribute funds to Subrecipients in which the BPO terms and conditions are replaced with the Subagreement terms and conditions. The BPO is created and modified after a Subagreement or Subagreement modification has been fully signed.

**Marketplace:** Marketplace is the university's official procurement to pay system. The software is used by CU Boulder to create and approve purchase requisitions, place purchase orders, receive goods and services and process invoices.

**Subagreement:** A generic term used for Subaward or Subcontract.

**Subaward:** A subaward is defined in the [U. S. Office of Management and Budget's Uniform Guidance, 2 CFR 200.1](#) as: *An award provided by a pass-through entity 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 a pass-through entity. It does not include payments to a contractor, beneficiary, or participant. A subaward may be provided through any form of legal agreement consistent with criteria in 200.331, including an agreement that the pass-through entity considers a contract.*

**Subcontract:** A subcontract is an award provided by the prime sponsor to a subcontractor for the subcontractor to carry out part of the work on an award received by the prime sponsor, for which the principal purpose of the award is to acquire property or services for direct benefit or use of the sponsor.

**Sub:** Shortened form of the words Subrecipient or Subcontractor.

### III. PROCEDURE

#### A. Subrecipient Invoice Received

When a Sub invoice is received against a BPO in Marketplace, it becomes a voucher with a “pending” status. Those with appropriate fiscal roles for the Sub’s speedtype receive an automated notice from Marketplace that a voucher is pending.

#### B. Approval of Delegation Documentation

While it is the responsibility of PIs to approve Sub invoices, PIs can delegate Sub invoice approval authority to another person with programmatic oversight. If a PI delegates their authority to another person, that delegation is required to be in writing and attached to the BPO via Comments or attached to the Voucher via Comments. This delegation is required to be **renewed annually**, if not more frequently as needed, and is not intended as a blanket delegation for the duration of the BPO. Delegation authority can be through any written communication, such as an email, memo, or letter between the PI and the person receiving approval authority.

#### C. Subrecipient Invoice Approval

A PI or their delegate must review and approve every Sub invoice prior to payment. Vouchers shall not be approved in Marketplace until the PI or delegate has reviewed the invoice for the following:

- Accuracy of charges compared to approved budget
- Compliance with sponsor regulations (such as required certification)
- Sub’s burn rate
- Sub’s performance in accordance with their statement of work.

Example checklist for invoice review can be found here: [Invoice Monitoring / Approval Checklist](#).

Every subagreement issued by CU Boulder includes language that CU Boulder reserves the right to reject an invoice, which mirrors the policy laid out in 2 CFR 200.305.

After review of the invoice, invoice approval by the PI or their delegate is required to be included on the invoice or attached to the BPO voucher via Comments. For CU Boulder to pay the invoice, an individual with the appropriate financial role must approve the invoice for payment, only once all internal approvals are obtained and attached to the BPO. (Refer to CU’s Procurement Service Center for [Purchase Order Invoicing](#) information).

### IV. RELATED DOCUMENTS AND RESOURCES

[Outgoing Subawards](#)

[Outgoing Subs FAQs](#)

[Invoice Monitoring / Approval Checklist](#)

[Subrecipient Monitoring](#)

### V. HISTORY

Changes	Date	Approved By
Adopted	05/16/2025	Alexa Van Dalsem