



New Mexico
Department of Finance
and Administration
Infrastructure Planning
and Development Division

Subrecipient Monitoring Process Checklist

Subrecipient Name:

Subrecipient UEI:

Subaward amount:

Federal Award ID Number (FAIN):

Assistance Listing Number (ALN or CFDA):

Period of Performance Dates:

1. Pre-Award Risk Assessment

- Determine subrecipient vs. contractor classification
- Evaluate financial stability (liquidity, prior audit findings, internal controls)
- Review past performance on federal or state awards
- Assess staff capacity and turnover
- Review written policies and procedures (financial, procurement, internal controls)
- Check SAM.gov registration and eligibility status
- Identify prior monitoring findings or corrective actions
- Assign overall risk level (Low / Medium / High)
- Document how risk level informs the type, frequency, and in intensity of monitoring

2. Subaward & Award Setup

- Executed subaward agreement on file
- Statement of work clearly defined
- Approved budget and budget narrative on file
- Subaward includes required federal award information (CFDA/ALN) and compliance requirements.

***Disclosure:** This checklist provides a comprehensive framework to ensure all necessary components of subrecipient monitoring are reviewed and tracked. You can customize this template as needed to fit specific grant types or funding requirements. This helps maintain clear records of your monitoring activities and ensures that subrecipients comply with the terms of their agreements.

- Reporting requirements and due dates documented
 - Record retention requirements communicated
 - Cost-sharing or match requirements documented (if applicable)
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3. Financial Monitoring

- Review financial reports (e.g., SF-425 or equivalent) for accuracy and completeness
 - Review invoices against approved budget and scope of work
 - Verify costs are necessary, reasonable, allocable, and allowable
 - Confirm expenditures align with the approved period of performance
 - Verify cost-sharing/match contributions are documented and met
 - Monitor drawdowns and cash management practices
 - Follow up on questioned or unsupported costs
 - Document all financial review actions
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4. Programmatic Monitoring

- Review progress reports against performance goals and objectives
 - Confirm goals are **SMART** (Specific, Measurable, Achievable, Relevant, Time-bound)
 - Track deliverables and milestones
 - Review outputs and outcomes for consistency with approved scope
 - Identify delays, risks, or performance concerns
 - Document technical assistance or guidance provided
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5. Compliance Monitoring

- Review compliance with 2 CFR Part 200 (Uniform Guidance)
 - Confirm procurement standards are followed (federal and state, as applicable)
 - Verify internal controls are in place and functioning
 - Review audit status (Single Audit, if applicable) and findings
 - Verify EEO compliance
 - Review Section 3 compliance (if applicable)
 - Review Fair Housing requirements (if applicable)
 - Confirm record retention and documentation practices
 - Identify and document any compliance issues
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6. Monitoring Methods

- Desk reviews conducted (financial and programmatic)
 - Site visit conducted (if applicable based on risk)
 - Monitoring results documented and retained
 - Monitoring frequency aligns with assigned risk level
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7. Corrective Action & Follow-Up

- Issues clearly documented and communicated to subrecipient
 - Corrective action plan requested when needed
 - Timeline for corrective actions established
 - Corrective actions reviewed and verified as completed
 - Escalation procedures followed if issues persist
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8. Communication & Technical Assistance

- Maintain regular communication with subrecipient and document key discussions, guidance provided, and follow-up actions
 - Provide guidance and technical assistance as needed
 - Communicate and document expectations when issues are identified
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9. Internal Systems & Documentation

- Monitoring activities logged in internal tracking system
 - Financial, programmatic, and compliance records organized
 - Risk assessments and monitoring plans retained
 - Documentation supports audit readiness
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10. Closeout Monitoring

- Final financial report reviewed and approved
 - Final programmatic report reviewed and approved
 - All deliverables received and verified
 - All corrective actions resolved
 - Subaward formally closed and documented in accordance with award requirements
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Optional Enhancements (Best Practice)

- Risk reassessment conducted periodically
 - Monitoring plan updated as needed
 - Lessons learned documented for future awards
 - Continuous improvement measures identified
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