

**SUBRECIPIENT MONITORING AGREEMENT  
BETWEEN THE CITY OF COLUMBIA, AND  
THE COUNTY OF BOONE, MISSOURI**

**FY2023 JUSTICE ASSISTANCE GRANT (JAG) PROGRAM AWARD**

THIS AGREEMENT dated the \_\_\_\_\_ day of \_\_\_\_\_, 2024, is made by and between **Boone County, Missouri** through its County Commission (herein "County"), and the **City of Columbia, Missouri** (herein "City"),

**WHEREAS**, both the City and the County are empowered to enter into a cooperative agreement for the purposes herein stated pursuant to RSMo §70.220; and

**WHEREAS**, the City and County are participants in the Justice Assistance Grant Program, Award #15PBJA-23-GG-06067-JAGX, and have been awarded funds thereunder; and

**WHEREAS**, the County acts as the applicant/fiscal agent for the joint funds for purposes of the aforementioned grant; and

**WHEREAS**, the City acts as the subrecipient for purposes of said grant; and

**WHEREAS**, in order to comply with the terms of the grant, certain additional agreements are required to provide reasonable assurance that the Federal award compliance requirements are met.

**NOW, THEREFORE**, the County and City agree as follows:

1. The City, consistent with its current external auditing practices, agrees to subject expenditures under the Justice Assistance Grant Program Award, Award #15PBJA-23-GG-06067-JAGX, to audit protocols as dictated by the Compliance Supplement, a copy of which is attached hereto and incorporated herein by reference.
2. The City agrees to provide County with information reasonably requested to comply with the "subrecipient monitoring" requirements of the federal grant Compliance Supplement, a copy of which are attached hereto and incorporated herein by reference.
3. The City will provide the County a report based upon its audit relating to the expenditures of the funds it receives under the Intergovernmental Cooperative Agreement between the City and the County relating to the Justice Assistance Grant Program Award for Fiscal Year 2023.
4. The City agrees to comply with all provisions and requirements as set out by the Department of Justice in connection with the award of the subject grant. To the extent that the City's expenditures of the grant are questioned by the Department of

Justice or its designee and amounts are determined to be disallowed or required to be paid back to the Department of Justice, the City will make said payment consistent with the requirements of the Department of Justice.

5. The parties will cooperate with each other to furnish any and all documentation required to comply with the requirements of the subject grant.

6. This agreement relates to FY2023 Justice Assistance Grant Program Award #15PBJA-23-GG-06067-JAGX, CFDA #16.738.

**IN WITNESS WHEREOF**, the individual parties, by and through their duly authorized representatives signatories, have executed this agreement on the day and year above first written.

**COUNTY OF BOONE**  
By its County Commission  
By:

\_\_\_\_\_  
Kip Kendrick, Presiding Commissioner

ATTEST:

\_\_\_\_\_  
Brianna L. Lennon, Clerk of the County Commission

APPROVED AS TO FORM:

\_\_\_\_\_  
Charles J. Dykhouse, County Counselor

**CITY OF COLUMBIA**  
By:

\_\_\_\_\_  
De'Carlton Seewood, City Manager

ATTEST:

\_\_\_\_\_  
Sheela Amin, City Clerk

APPROVED AS TO FORM:

\_\_\_\_\_  
Nancy Thompson, City Attorney

**ATTACHMENT – Subrecipient Monitoring Compliance Supplement**

## M. SUBRECIPIENT MONITORING

Note: Transfers of federal awards to another component of the same auditee under 2 CFR Part 200, Subpart F, do not constitute a subrecipient or contractor relationship.

### Compliance Requirements

A pass-through entity (PTE) must:

- *Identify the Award and Applicable Requirements* – Clearly identify to the subrecipient: (1) the award as a subaward at the time of subaward (or subsequent subaward modification) by providing the information described in 2 CFR section 200.331(a)(1); (2) all requirements imposed by the PTE on the subrecipient so that the federal award is used in accordance with federal statutes, regulations, and the terms and conditions of the award (2 CFR section 200.331(a)(2)); and (3) any additional requirements that the PTE imposes on the subrecipient in order for the PTE to meet its own responsibility for the federal award (e.g., financial, performance, and special reports) (2 CFR section 200.331(a)(3)).
- *Evaluate Risk* – Evaluate each subrecipient’s risk of noncompliance for purposes of determining the appropriate subrecipient monitoring related to the subaward (2 CFR section 200.332(b)). This evaluation of risk may include consideration of such factors as the following:
  1. The subrecipient’s prior experience with the same or similar subawards;
  2. The results of previous audits including whether or not the subrecipient receives single audit in accordance with 2 CFR Part 200, Subpart F, and the extent to which the same or similar subaward has been audited as a major program;
  3. Whether the subrecipient has new personnel or new or substantially changed systems; and
  4. The extent and results of federal awarding agency monitoring (e.g., if the subrecipient also receives federal awards directly from a federal awarding agency).
- *Monitor* – Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, complies with the terms and conditions of the subaward, and achieves performance goals (2 CFR sections 200.332(d) through (f)). In addition to procedures identified as necessary based upon the evaluation of subrecipient risk or specifically required by the terms and conditions of the award, subaward monitoring must include the following:
  1. Reviewing financial and programmatic (performance and special reports) required by the PTE.

2. Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the federal award provided to the subrecipient from the PTE detected through audits, on-site reviews, and other means.
  3. Issuing a management decision for audit findings pertaining to the federal award provided to the subrecipient from the PTE as required by 2 CFR section 200.521.
- *Ensure Accountability of For-Profit Subrecipients* – Some federal awards may be passed through to for-profit entities. For-profit subrecipients are accountable to the PTE for the use of the federal funds provided. Because 2 CFR Part 200 does not make Subpart F applicable to for-profit subrecipients, the PTE is responsible for establishing requirements, as necessary, to ensure compliance by for-profit subrecipients for the subaward. The agreement with the for-profit subrecipient must describe applicable compliance requirements and the for-profit subrecipient's compliance responsibility. Methods to ensure compliance for federal awards made to for-profit subrecipients may include pre-award audits, monitoring during the agreement, and post-award audits (2 CFR section 200.501(h)).

### **Source of Governing Requirements**

The requirements for subrecipient monitoring for the subaward are contained in 31 USC 7502(f)(2) (Single Audit Act Amendments of 1996 (Pub. L. No. 104-156)), 2 CFR sections 200.330, .331, and .501(h); federal awarding agency regulations; and the terms and conditions of the award.

### **Audit Objectives**

1. Obtain an understanding of internal control, assess risk, and test internal control as required by 2 CFR section 200.514(c).
2. Determine whether the PTE identified the subaward and applicable requirements at the time of the subaward (or subsequent subaward modification) in the terms and conditions of the subaward and other award documents sufficient for the PTE to comply with federal statutes, regulations, and the terms and conditions of the federal award.
3. Determine whether the PTE monitored subrecipient activities to provide reasonable assurance that the subrecipient administered the subaward in compliance with the terms and conditions of the subaward.

### **Suggested Audit Procedures – Internal Control**

1. Perform procedures to obtain an understanding of internal control sufficient to plan the audit to support a low assessed level of control risk for the program.

2. Plan the testing of internal control to support a low assessed level of control risk for subrecipient monitoring and perform the testing of internal control as planned. If internal control over some or all of the compliance requirements is likely to be ineffective, see the alternative procedures in 2 CFR section 200.514(c)(4), including reporting a significant deficiency or material weakness in accordance with 2 CFR section 200.516, assessing the control risk at the maximum and considering whether additional compliance tests and reporting are required because of ineffective internal control.
3. Consider the results of the testing of internal control in assessing the remaining risk of noncompliance. Use this as the basis for determining the nature, timing, and extent (e.g., number of transactions to be selected) of substantive tests of compliance.

### **Suggested Audit Procedures – Compliance**

Note: The auditor may consider coordinating the tests related to subrecipients performed as part of C, “Cash Management” (tests of cash reporting submitted by subrecipients); E, “Eligibility” (tests that subawards were made only to eligible subrecipients); I, “Procurement and Suspension and Debarment” (tests of ensuring that a subrecipient is not suspended or debarred) ; and L, “Reporting (tests of performance data reported to funding sources) with the testing of “Subrecipient Monitoring

1. Review the PTE’s subrecipient monitoring policies and procedures to gain an understanding of the PTE’s process to identify subawards, evaluate risk of noncompliance, and perform monitoring procedures based upon identified risks.
2. Review subaward documents including the terms and conditions of the subaward to ascertain if, at the time of subaward (or subsequent subaward modification), the PTE made the subrecipient aware of the award information required by 2 CFR section 200.331(a) sufficient for the PTE to comply with federal statutes, regulations, and the terms and conditions of the award.
3. Review the PTE’s documentation of monitoring the subaward and consider if the PTE’s monitoring provided reasonable assurance that the subrecipient used the subaward for authorized purposes in compliance with federal statutes, regulations, and the terms and conditions of the subaward.
4. Ascertain if the PTE verified that subrecipients expected to be audited as required by 2 CFR Part 200, Subpart F, met this requirement (2 CFR section 200.331(f)). This verification may be performed as part of the required monitoring under 2 CFR section 200.331(d)(2) to ensure that the subrecipient takes timely and appropriate action on deficiencies detected through audits.