



Missouri Office of Homeland Security

Division of Grants

Information Bulletin

OHS-GT-2018-009-01

Subject: Policy for Requirements of Subrecipient Pass-Through Entities

Applicable To: SHSP/UASI

Effective Date: July 1, 2020

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I. Introduction

The Missouri Office of Homeland Security (OHS), Division of Grants is providing this policy to assist local governments, state agencies and nonprofits in understanding federal requirements for pass-through entities. The 2 CFR 200 contains requirements for pass-through entities in 2 CFR 200.331 These requirements are discussed throughout this information bulletin.

A pass-through entity is defined in the 2 CFR 200.74 as a “non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program”. An agency that passes funds, equipment, supplies, etc., to another agency to carry out part of a Federal program is a pass-through entity.

This information bulletin replaces OHS-GT-2018-009 “Policy for Requirements of Subrecipient Pass-Through Entities” dated September 18, 2018.

II. Risk Assessment

Pass-through entities are required by 2 CFR 200.331 (b) to assess subrecipients’ risk of noncompliance with grant requirements. This requirement discusses factors, which may be considered for the evaluation of subrecipients’ risk of noncompliance. A pass-through entity may also choose to assess other factors not discussed in that section. Risk assessments should be completed by pass-through entities for each subrecipient before an award is issued.

Upon completion of the risk assessment, the pass-through entity may choose to impose special conditions on the subrecipient’s subaward. Any special conditions should be included in the subaward Articles of Agreement, which is issued to the subrecipient.

Additional information on subrecipient risk assessments can be found in the OHS Information Bulletin (IB) OHS-GT-2012-001 - Policy on Monitoring Subrecipient Reporting, Recordkeeping, and Internal Operation and Accounting Control Systems, as amended.

III. Subaward

Pass-through entities are required by 2 CFR 200.331 (a) to issue subawards to subrecipients. The elements required to be detailed in the subaward are also referenced in this section. The OHS maintains a subaward template, which is available for use. If a pass-through entity chooses to use their own subaward format, it must be approved by the OHS prior to issuance. All of the Articles of Agreement, which are in the subaward issued to the pass-through entity from the OHS, must be passed through to the subrecipient via the subaward.

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If any of the elements detailed in the subaward change, a subaward modification or adjustment must be completed to update the subaward. The OHS maintains a Grant Adjustment Notice (GAN) template that is available for use.

Pass-through entities are also required to issue denial notifications to any applicants who did not receive funding through a subaward.

IV. Monitoring

In addition to completing risk assessments and issuing subawards to subrecipients, pass-through entities are also required to monitor subrecipients for compliance with Federal and state statutes, regulations, terms and conditions of the subaward, and any other applicable grant requirements. This requirement is discussed in 2 CFR 200.331 (d).

The OHS maintains desk and on-site grant monitoring form templates, which are available for use.

Additional information on subrecipient monitoring and the minimum standards for subrecipient monitoring can be found in the OHS IB OHS-GT-2012-001 - Policy on Monitoring Subrecipient Reporting, Recordkeeping, and Internal Operation and Accounting Control Systems, as amended.

V. Grant Contact Information

The OHS grant points of contact can be located at the following link:
<http://www.dps.mo.gov/dir/programs/ohs/grantstraining/?h=0>

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