

## **Subrecipient Fraud Prevention Policy**

### **Definition of a Subrecipient**

A subrecipient is a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal award.

### **Definition of Fraud**

Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to their injury.

### **Policy**

An Executive Staff member, in conjunction with the particular grant writer, are responsible for the evaluation of each grant subrecipient's risk for compliance with Federal statutes, regulations, and terms and conditions of the subaward. The College adheres to the specifics in the core monitoring guidelines according to the Uniform Grant Guidance. As the prime recipient, RVCC ultimately has responsibility for the subrecipient's performance and compliance with Federal and State regulations and requirements.

For Federal grants for which the College is the prime recipient, the College is responsible for monitoring subrecipients for proper grant administration. The College is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. The College is responsible for informing the appropriate parties when subrecipients are not in compliance with Federal and State regulations and requirements.

**Responsible Administrator** – Vice President for Finance and Facilities

### **Revised and reaffirmed**

- November 14, 2022

**Communication** – This policy is communicated to the College Community in the following documents:

- New Grants Packet
- College Website