

Subrecipient Monitoring Checklist: Stevens Amendment

Grantee Name: _____ Reviewer: _____

Phase 1: Pre-Award & Contracting

Before you send the first dollar, ensure the “legal hooks” are in place.

- Agreement Language:** does the sub-award contract explicitly list the Stevens Amendment as a “Special Condition”?
- Flow-Down Provision:** does the contract require them to apply these same rules to any of their lower-tier contractors?
- Risk-Assessment:** have you evaluated the subrecipient’s experience with federal grants? (Newer organizations need more frequent “spot checks” of their outreach materials).

Phase 2: Ongoing Desk Reviews

Perform this check once per quarter or whenever a subrecipient launches a new campaign.

- Website Review:** check the subrecipient’s program landing page. Does it include the required disclosure?
- Social Media Spot-Check:** if they are posting about the program on a social media platform, do the posts include a link to the full disclosure?
- Publications:** review at least one report or brochure produced this quarter.
 - Is the **Federal Agency** named?
 - Is the **Federal Percentage** listed?
 - Is the **Federal Dollar Amount** listed?
 - Is the **Private/Non-Fed Share** listed (even if 0%)?

Phase 3: Procedure & Bidding

If the subrecipient is using federal funds to buy equipment or hire a contractor.

- RFP/IFB Language:** did the subrecipient include the Stevens Amendment disclosure in their big solicitations?
- Contract Awards:** does their documentation show they informed potential bidders that the project is taxpayer-funded?

Tips & Tricks

When you pass federal funds down to another organization (a **subrecipient**), you become the "Pass-Through Entity" (PTE). Under the **2024–2026 Uniform Guidance (2 CFR 200.332)**, you are legally responsible for their compliance.

If they fail to include the Stevens Amendment disclosure on their website or brochures, it's **your** audit finding. Use this checklist to stay ahead of it.

Red Flags to Watch For

- **“The Logo Only” Error:** the subrecipient thinks putting “Department of Labor logo” or “HHS logo” on a poster is enough. (It isn't, the text disclosure is mandatory).
- **“Static” Disclosure:** they are using the dollar amounts from last year's award instead of the current fiscal year's incremental funding.
- **The “Hiding” Disclosures:** the disclosure is in a 6pt font at the bottom of a 20-page document where no one can see it.

Management Decision/ Corrective Action

If you find a violation:

- **Issue a Written Notice:** inform them of the specific missing elements.
- **Request a “Correction Log”:** have them send you a screenshot or direct link of the updated website, or a PDF of the revised brochure.
- **Future Training:** if it happens twice, require their communications lead to attend a training module.