



FISCAL SPONSOR GUIDELINES AND REGULATIONS GOVERNING GRANTS MADE BY MASS HUMANITIES

Any organization that applies for a grant on behalf of an individual or organization that may not be eligible to apply directly to the Foundation for a grant (also commonly known as a pass-through or umbrella organization) is defined as the fiscal sponsor. The sponsored individual or organization, is known as the fiscal sponsor's subrecipient and will carry out the work of the project under the oversight of the fiscal sponsor.

The fiscal sponsor will be the recipient of the award (grantee) and is responsible for complying with the terms and conditions of the award including the maintenance of financial records, submission of financial and project reporting. Additionally, the fiscal sponsor for any award is responsible for the following.

1. The fiscal sponsor must maintain an organized prior approval system to manage the subrecipient's activities.
2. The fiscal sponsor shall review financial and performance reports submitted by the subrecipient.
3. The fiscal sponsor shall conduct site visits to review financial and programmatic records and observe operations.
4. The fiscal sponsor shall ensure the scope of the project as approved by the Foundation is not changed without prior approval from the Foundation.
5. The fiscal sponsor must monitor the activities of and maintain contact with the subrecipient as necessary to ensure compliance with all requirements and to ensure achievement of project goals.

6. OMB Circular A-133 state than an organization that expends more than \$750,000 in federal funds within a fiscal year is subject to a mandatory program audit. In addition to the fiscal sponsor's own audit, it must ensure its subrecipient has a single audit if one is required, and must require the subrecipient to give the fiscal sponsor and auditors access to its records and financial statements as necessary.
7. The fiscal sponsor is responsible for issuing management decisions on subrecipient audit findings and must see that the subrecipient takes timely and appropriate corrective action in response to the audit.
8. These and any other requirements must be detailed in a formal written agreement between the grantee and their subrecipient. A sample sponsorship agreement is available [here](#).
9. Fiscal sponsors shall forward a copy of their sponsorship agreement with the subrecipient (sponsored organization/person) to the Foundation and notify the Foundation in writing of any changes to that agreement.