

STANDARD OPERATING PROCEDURE (SOP)

SOP Number: 7
Effective Date: 11/22/2017
Last Reviewed: 04/23/2021

Title:

Subrecipient Setup & Monitoring

OSP Contact Information

Business Hours: 8:00 a.m. to 4:30 p.m., Monday-Friday (excluding holidays).

Main: 920-424-3215

E-mail: OSP@uwosh.edu;

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I. Overview

The Office of Sponsored Programs (OSP) provides services and oversight for new and existing subawards. In general, OSP pre-award staff are responsible for issuing new subaward agreements and amendments to existing agreements for those institutions determined to be subrecipients under 2 CFR 200.330. The pre-award team will initiate risk analysis of the subrecipient during the award phase and the post-award team is responsible for completing a thorough analysis. The post-award team is responsible for financial monitoring of the subrecipient, including regular SAM.gov status checks, annual financial risk assessments, review and processing of invoices, expenditure monitoring, ensuring deliverables and scope of work are met prior to issuing payment, and closeout of the subaward at the end of the project period.

The OSP Pre-Award team issues cost-reimbursable subagreements, however, in certain situations a fixed amount subagreement may be issued. Fixed amount subagreements require prior approval by the federal sponsor. Intention to work with a subrecipient must be clearly written in the grant proposal and subrecipient costs included in the proposal budget. Sponsor approval of the grant application is considered approval of the subrecipient as outlined in the proposal and budget.

II. Applicability

This procedure applies to any individuals involved with setup of new subawards, monitoring of subrecipient activities, audits of subrecipient status and the PI of the prime institution. If it is determined that an Academic Support Services Agreement (ASSA) (i.e. fee for service contract, or standard service agreement) is the appropriate type of agreement then the PI should contact the UW Oshkosh Purchasing Office.

III. Procedure

When UW Oshkosh is the Pass-Through Entity (PTE) of an external award then OSP can issue either 1). a subaward or 2). a shared grant via an *Agreement to Transfer Extramural Funds Between UW Institutions*, if the subrecipient is another UW System institution. The Uniform Guidance is the main guidance document for all subawards issued by OSP but staff will utilize the forms and templates when developing federal subaward agreements. Prior to proposal submission, OSP staff complete a *Subrecipient vs. Vendor/Contractor Determination* (Appendix A) and subsequently request a Subrecipient Risk Assessment (financial analysis) be completed by the post-award team prior to issuing a subaward (Appendix B). If a subrecipient is determined to be "high risk" then additional oversight and terms may be required as determined by the post-award team.

Subrecipient Documentation:

1. OSP collects subrecipient documents as follows:
 - a. Subrecipient Budget Table (in sponsor format)
 - b. Subrecipient Budget Narrative (in sponsor format)
 - c. Subrecipient Scope of Work (using UWO format, or similar)
 - d. Subrecipient Commitment Form (if determined to be a Subrecipient following Step #3)
 - e. Letter of Commitment (may be optional dependent on proposal)
 - f. Other documents as required by the sponsor
2. OSP Pre-Award staff review the documents and circulate for internal review (SOP #2: *Internal Review & Routing*), along with the main UW Oshkosh proposal
3. OSP Pre-Award staff complete a *Subrecipient vs. Contractor Determination* form to confirm subrecipient status

4. OSP Pre-Award staff Check SAM.gov records for intended subrecipient to ensure the entity is not debarred or suspended from receiving federal funds. See SOP #19: *Debarment and Suspension Certification* for the detailed process.
5. Through the Subrecipient Commitment Form, the proposed subaward will provide information on their current policies and practices, including Financial Conflict of Interest and Responsible Conduct in Research policies. If no policy is in place, the subrecipient will follow the policies of the prime institution.

Establishing a New Subaward:

1. OSP receives the Grant Award Notice (GAN) from the sponsor. If PI is notified first they should e-mail this notice to OSP@uwosh.edu
2. OSP requests that the Grants Accountant conducts a financial risk assessment of the intended subrecipient using the Financial Risk Analysis Form. The Grants Accountant reviews the subrecipient's A-133 Audit and performs a financial overview of the subrecipient to determine potential risk.
3. If minimal risk is determined then OSP will generate and negotiate the subagreement with the subrecipient institution. Documents in a typical federal subagreement packet include:
 - a. Subaward Agreement, or Agreement to Transfer Extramural Funds (for UW System collaborations)
 - b. Research Subaward Agreement 3A Prime Recipient Contact Information
 - c. Research Subaward Agreement 3B Page 1 Subrecipient Contact Information
 - d. Research Subaward Agreement 3B Page 2 Highest Compensated Officers (as applicable)
 - e. Memorandum of Understanding (as applicable)
 - f. Standard Research Agreement (use when FDP forms not needed)
 - g. Prime grant award notice
 - h. Approved Subrecipient budget, budget narrative and Scope of Work (appendices)
4. Once the subaward is successfully negotiated, the subrecipient's Authorized Organizational Representative (AOR) will sign the subagreement and return to OSP at OSP@uwosh.edu
5. OSP staff will obtain signature from the UW Oshkosh AOR. The subagreement is effective once both entities have signed the agreement, or as stated within the agreement.
6. A copy of the fully-executed agreement will be sent to the subrecipient and UWO PI
7. State of Wisconsin Procurement Guidelines require that sponsor approval is required prior to issuing any subagreement. This can be accomplished by either:
 - a. Outlining the intended subrecipient relationship in the proposal prior to submission
 - b. Documented after-the-fact in an approval e-mail or letter from the sponsor.
8. Agreement status will be tracked on the OSP master tracking sheet for dates of signatures by all entities
9. On an annual basis, OSP staff will send a request for updated audit certification to each subrecipient receiving federal funds. An updated audit status ensures payments are processed on time and maintains compliance with federal regulations. An Audit Certification template is available from OSP.

FFATA Reporting:

1. The intent of the Federal Funding Accountability and Transparency Act (FFATA) is to reduce wasteful spending in the government by making information on federal awards and expenditures publically available. The FFATA Subaward Reporting System (FSRS) is the reporting tool Federal prime awardees (i.e. prime contractors and prime grants recipients) use to capture and report subaward and executive compensation data regarding their first-tier subawards. Reporting requirements are met when the prime awardee reports through www.fsrs.gov. The subaward information entered in FSRS will then be displayed on www.USASpending.gov associated with the prime award furthering Federal spending transparency.
2. As of October 1, 2010, FFATA legislation requires prime grant recipients to report subawards greater than or equal to \$25,000 as outlined in the [Office of Management and Budgets guidance issued August 27, 2010](#). The prime awardee is required to file a FFATA sub-award report by the end of the month following the month in which the prime recipient awards any sub-grant greater than or equal to \$25,000.
3. If the Pre-Award team does not find a prime award in FSRS that should be available, the grant making official should be contacted to ensure they reported the prime grant award information through their FAADS+ file submission to USASpending.gov. The Agency's FAADS+ submission is the authoritative source for the basic grant award information used to pre-populate many of the prime award details in your FFATA report. For more information on the FAADS+ format, please read [OMB M-09-19](#).

4. If there are issues upon report submission in FSRs.gov, the pre-award team will make an attempt to resolve the issue if possible. If the issue appears to be with the FSRs system, attempts to submit the report are documented. Three attempts are made to submit the report. Once three unsuccessful attempts are made, we mark the report as unreportable in the project file.

UW Oshkosh Subaward Lifecycle

<i>Proposal Preparation</i>		
Procedure	Responsible Staff	Systems/Tools
OSP receives subrecipient Statement of Work, Budget, Budget Narrative, letter of commitment, and other sponsor-required documents	<ul style="list-style-type: none"> ▪ UWO PI ▪ Subrecipient PI ▪ Pre-Award (UWO & Sub) 	<ul style="list-style-type: none"> ▪ E-mail ▪ Grants.gov Workspace ▪ NSF Fastlane/Research.gov
Review SOW, budget, budget narrative and other documents	<ul style="list-style-type: none"> ▪ Pre-Award Team (UWO & Sub) ▪ Post-Award Accountant 	<ul style="list-style-type: none"> ▪ E-mail ▪ Visual review
Perform subrecipient versus contractor determination	<ul style="list-style-type: none"> ▪ Pre-Award Team (UWO) 	<ul style="list-style-type: none"> ▪ Subrecipient Determination Form
Complete the UWO Subrecipient Commitment Form	<ul style="list-style-type: none"> ▪ Pre-Award Team (Sub) ▪ Pre-Award Team (UWO) 	<ul style="list-style-type: none"> ▪ Subrecipient Commitment Form ▪ E-mail
<i>Award Setup</i>		
Procedure	Responsible Staff	Systems/Tools
Send Grant Award Notice to OSP	<ul style="list-style-type: none"> ▪ PI, Department/Division 	<ul style="list-style-type: none"> • E-mail
Confirmation of subaward information	<ul style="list-style-type: none"> ▪ Pre-Award Team (UWO) 	<ul style="list-style-type: none"> • E-mail
Subrecipient Risk Assessment: <ul style="list-style-type: none"> • Audit Certification • A-133 Audit review • Institutional & compliance congruency assessment • SAM.gov debarment check 	<ul style="list-style-type: none"> ▪ Pre-Award Team (Sub) ▪ Pre-Award Team (UWO) ▪ Post-Award Grants Accountant (complete financial risk analysis) 	<ul style="list-style-type: none"> • SAM.gov • Audit Certification form • Financial Risk Analysis form
Generate and negotiate subaward, Send to Subrecipient for review and signatures	<ul style="list-style-type: none"> ▪ Pre-Award Team (UWO) ▪ Pre-Award Team (Sub) 	<ul style="list-style-type: none"> • E-mail
Subaward Purchase Order setup	<ul style="list-style-type: none"> ▪ Post-Award Accountant ▪ Procurement ▪ UWO PI 	<ul style="list-style-type: none"> • Purchase Order paperwork (on Purchasing website)
FFATA Reporting of Subaward and Executive Compensation (as applicable)	<ul style="list-style-type: none"> ▪ Pre-Award Team (UWO) 	<ul style="list-style-type: none"> • www.fsr.gov • Award notice
<i>Award Management</i>		
Procedure	Responsible Staff	Systems/Tools
Subaward invoice review/payments	<ul style="list-style-type: none"> ▪ Post-Award (UWO; process invoices) ▪ Post-Award (sub; initiate invoices) ▪ PI (UWO, review invoices) ▪ Accounts Payable (UWO) 	<ul style="list-style-type: none"> • Shared Financial System • Project Lite/WISER • ImageNow
Subaward modifications (budget)	<ul style="list-style-type: none"> ▪ Post-Award (UWO) ▪ Pre-Award Team (change of Scope, performance period, change in Staff, NCE) ▪ PIs 	<ul style="list-style-type: none"> • Sponsor's modification request process/E-mail request
Annual audit reviews	<ul style="list-style-type: none"> ▪ Post-Award (UWO) 	<ul style="list-style-type: none"> • Audit certification form • Financial Risk Analysis form • Review of SAM.gov records
<i>Closeout</i>		
Procedure	Responsible Staff	Systems/Tools
Final review	<ul style="list-style-type: none"> ▪ PI ▪ Post-Award (UWO) 	<ul style="list-style-type: none"> • Closeout Checklists • Purchasing Information Inquiry • Shared Financial System • Project Lite/WISER

Modifying an Existing Subagreement:

1. Modifications to existing subawards or shared grants are processed by the Post-Award team if they relate to the budget. The Post-Award team can request assistance from the Pre-Award team for changes to Scope of Work, changes in staffing or effort, or no-cost extensions.
2. If the modification involves an Increase in Funding, the PI provides the updated budget and budget narrative for that increment.
3. If the modification involves a change to the Scope of Work, the PI provides the updated Scope of Work and any other requested changes to the original agreement.
4. The Grants Accountant or OSP will review the requested modification. Some modifications may require prior approval by the sponsor. A [Prior Approval Matrix](#) is available for guidance on which modifications will need to be approved by the Program Officer prior to implementation. Modifications that require Prior Approval must be submitted according to the sponsor's guidance. For example, NSF requests are submitted through NSF's electronic system, [Research.gov](#) by OSP. Prior approval requests submitted to NIH will follow the [Grants Policy Statement, Section 8.1.3](#).
5. A subaward amendment will be issued, if approved by UW Oshkosh. Subaward amendments require signature by the subrecipient's Authorized Representative and UWO's Authorized Representative in order to take effect. Modifications are effective upon signature by the last Authorized Representative.

Issuing a New Shared Grant:

1. Follow procedure outlined under "Issuing a New Subaward."

Shared Grants are budgeted under "Other Direct Costs" as a single line item (Direct + Indirect Costs). The budget justification should provide an explanation of the shared grant relationship, including that UW System consists of multiple universities/locations within a larger university system. Supporting institutions receiving the shared grant should submit a full proposed budget to UW Oshkosh, including all direct and indirect costs. This should have signatory approval from the AOR at the supporting institution.

- Both institutions should establish a 144- or 133- account
- The prime institution is responsible for all reporting requirements and for reporting the full award amount to the Board of Regents
- The prime institution will reimburse the subrecipient's indirect cost at their negotiated rate, unless capped by the sponsor.
- Class code 3301 (Legacy) or account code 3910 (Share Financial System) should be used by the prime institution to process payment to the subrecipient. The subrecipient should deposit the payment using revenue code 9910. This allows proper identification of amounts by UW-System Administration
- An Agreement to Transfer Extramural Funds between UW Institutions is completed by the prime institution and issued to the subrecipient for signature.

Modifications to Shared Grant:

1. Follow procedure outlined under "Modifying an Existing Subagreement"
2. The Grants Accountant or OSP will issue the amendment detailing only the requested modifications to the existing subagreement
3. The amendment is signed by the AOR at each institution and becomes effective once the last Authorized Representative provides signature.
4. A copy of the fully-executed amendment will be provided to the subrecipient. Copies will also be kept on file with OSP and with the UW Oshkosh PI.

Monitoring:

1. The Post-Award team will regularly monitor SAM.gov record checks to ensure the subrecipient is not presently debarred or suspended from receiving federal funds.
2. Invoices submitted by the subrecipient will be reviewed by the Grants Accountant and the prime PI. PI approval (through a form or e-mail) must confirm that the subrecipient has achieved their deliverables for the given performance period of the invoice, prior to the invoice being paid by UW Oshkosh.
3. During subaward closeout, the Grants Accountant will inquire and receive confirmation, via e-mail or by a formal closeout form, that the sub has no outstanding invoices needing payment by UW Oshkosh.

IV. Guidance Documents/Policy Links:

- [OMB Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards \(Uniform Guidance\)](#)
- [Subrecipient vs. Contractor Determination Questionnaire \(see appendix\)](#)
- [Federal Demonstration Partnership Website](#)
- [Prior Approval Matrix](#)
- Subrecipient Risk Analysis Form
 - Request from OSP
- Audit Certification form
 - Request from OSP

V. Templates/Forms:

- **Federal Demonstration Partnership (FDP) Federal Subaward Template**

The FDP Subaward Templates were designed to expedite review among FDP member institutions. However, non-FDP member institutions may also use the templates for setting up federal subawards. The templates are not meant to be recycled or edited. FDP is testing the efficacy and efficiency of using online organization profiles in lieu of subrecipient commitment forms to obtain information needed by pass-through entities when they are issuing subawards

 - [Cost Reimbursable Research Subaward Agreement](#)
 - [Fixed Price Reimbursable Research Subaward Agreement](#)
 - [Attachment 3A: PTE Contact Information Template](#)
 - [Attachment 3B Page 1: Subrecipient Contact Information Template](#)
 - [Attachment 3B Page 2: Highest Compensated Officers Template](#)
 - [Subrecipient Invoice Template](#)
- **Non-Federal Subaward Template**
 - Standard Research Agreement (UWO is lead/client), or;
 - Standard Research Agreement (UWO is collaborator/provider)
 - Request from OSP
- **Collaborative Grants with Other UW System Institutions**
 - Agreement to Transfer Extramural Funds Between UW Institutions Template
 - Request from OSP

VI. Definitions

1. **Subaward:** Official agreement between a grant recipient (i.e. prime recipient) and a third party (i.e. subrecipient).
2. **Subrecipient:** A subrecipient receives a portion of the funds in order to perform a part of the recipient's intended project activities. A subrecipient contributes intellectual merit and is *responsible for a portion of the project* for the overall benefit of the prime entity. Wisconsin State Procurement guidelines require that all subrecipients be identified and approved by the sponsor
3. **Vendor/Contractor:** If the third party is contributing work or services that *support* the prime's role on the project then they would likely be considered a contractor/vendor. They offer services competitively and are not responsible for the overall outcome or reporting of the project.
4. **Shared Grant:** A shared grant is an agreement between UW Oshkosh and another UW System institution. When this relationship exists, transfer of funds may occur between the institutions if the relationship was described in the project Scope of Work. Shared Grant relationships are typically listed in the proposal and determined at the time of grant proposal submission. They may also be determined while the award is being issued. An Inter-Institutional Transfer Agreement (IIA) is utilized to perform funding transfers between the UW System institutions.
5. **Pass-Through Entity (PTE):** The PTE is also known as the Prime Recipient of grant funding. The PTE initially receives the award amount and "passes through" a portion of the award to the subrecipient

- VII. Contact Information:** For questions or comments please contact OSP@uwosh.edu or 920-424-3215
- VIII. Revision History:** March 22, 2019; April 17, 2019; August 11, 2020, September 10, 2020, April 30, 2021

Checklist to Determine Subrecipient or Contractor Classification

OBJECTIVE: Generally, the determination of the relationship with an entity is verified through the institutional review of the proposal narrative, budget justification, and other related proposal documents, as well as through discussions with key personnel prior to proposal submission. When the relationship remains unclear, this form may provide assistance in making an accurate determination.

DEFINITIONS FROM UNIFORM GUIDANCE (2 CFR, PART 200):

Subrecipient:

§200.93 Subrecipient means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding

Contractor:

§200.23 Contractor means an entity that receives a contract as defined in §200.22 Contract.

§200.22 Contract means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award.

INSTRUCTIONS: Complete sections one and two of the checklist by marking all characteristics that apply to the outside entity. The section with the greatest number of marked characteristics indicates the likely type of relationship the entity will have with the University. On occasion there may be exceptions to the type of relationship indicated by the completed checklist. In these situations, the substance of the relationship should be given greater consideration than the form of agreement between the University and the outside entity. Section 3 should be used to provide documentation on the use of judgment in determining the proper relationship classification.

NAME OF OUTSIDE ENTITY: _____

SECTION 1 - SUBRECIPIENT

Description: A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

- 1. Determines who is eligible to receive what Federal assistance;
- 2. Has its performance measured in relation to whether objectives of a Federal program were met;
- 3. Has responsibility for programmatic decision making;
- 4. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

Entities that include these characteristics are responsible for adherence to applicable Federal program requirements specified in the Federal award.

SECTION 2 - CONTRACTOR

Description: A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the contractor:

- 1. Provides the goods and services within normal business operations;
- 2. Provides similar goods or services to many different purchasers;
- 3. Normally operates in a competitive environment;
- 4. Provides goods or services that are ancillary to the operation of the Federal program.

Entities that include these characteristics are not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

FINAL DETERMINATION:

SUBRECIPIENT **CONTRACTOR**

OPTIONAL - SECTION 3 - USE OF JUDGMENT (use only when the determination cannot clearly be made using the above criteria)

Description: In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.

Explanation of Use of Judgment Determination:

Prepared By: _____

Date: _____

2 CFR Part 200 Subpart F Audit Certification Form

Audits of States, Local Governments, Indian Tribes, and Non-Profit Organizations

Contact Information	
Subrecipient Name (Agency, Local Government, or Organization):	
Authorized Organizational Representative:	
Address:	
Email:	Phone #:

Purpose: As a pass-through entity of federal grant funds, the University of Wisconsin Oshkosh ("PTE") is required by 2 CFR Part 200 Subpart F to monitor activities of subrecipients to ensure federal awards are used for authorized purposes and verify that subrecipients expending \$750,000 or more in federal awards during their fiscal year have met the 2 CFR Part 200 Subpart F Audit Requirements. Your entity is a subrecipient subject to such monitoring by "PTE" because it is a non-federal entity that expends federal grant funds received from the "PTE" to carry out a federal program.

We have identified your organization as having received U.S. government funds as a subrecipient to UW Oshkosh during our fiscal year ending June 30, 2020. As a subrecipient of U.S. government funds, we request certification form your organization that you are in compliance with audit requirements outlined in 2 CFR Part 200 Subpart F.

Directions: As required by 2 CFR Part 200 Subpart F, non-federal entities that expend \$750,000 in federal awards in a fiscal year shall have a single or program-specific audit conducted for that year. If your entity **is not** subject to these requirements, complete Section A below. If your entity **is** subject to these requirements, complete Section B below. Once completed: sign, date, and return this form to mannle@uwosh.edu and OSP@uwosh.edu. Failure to return this completed Audit Certification Form may result in delay of subrecipient agreement processing, withholding of federal awards or disallowance of costs, and suspension or termination of federal awards.

SECTION A: Entities NOT subject to the audit requirements of 2 CFR Part 200 Subpart F

Our entity is not subject to the requirements of 2 CFR Part 200 Subpart F because (check all that apply):

- We did not expend \$750,000 or more of *total* federal awards during the fiscal year.
- We are a for-profit agency.
- We are exempt for other reasons (describe):

By signing below, I agree that we are still subject to the audit requirements, laws and regulations governing the program(s) in which we participate, that we are required to maintain records of federal funding and to provide access to such records by federal and state agencies and their designees, and that "PTE" may request and be provided access to additional information and/or documentation to ensure proper stewardship of federal funds.

SECTION B: Entities that ARE subject to the audit requirements of 2 CFR Part 200 Subpart F

(Complete the information below and check the appropriate box)

- We completed our last 2CFR200 Subpart F Single Audit on [enter date] _____ for Fiscal Year ending [enter date] _____. There were no findings related to federal awards from "PTE." No follow-up action is required by "PTE" as the pass-through entity.
A complete copy of the single audit report, which includes exceptions, corrective action plan and management response, is either provided electronically to OSP@uwosh.edu or can be found at the following link:
_____.
- We completed our last 2CFR200 Subpart F Single Audit on [enter date] _____ for Fiscal Year ending [enter date] _____. There were findings related to federal awards.
A complete copy of the audit report, which includes exceptions, corrective action plan and management response, is either provided electronically to OSP@uwosh.edu or can be found at the following link: _____.
- Our completed 2CFR200 Subpart F Single Audit will be available on _____ [enter date] for Fiscal Year ending _____ [enter date]. We will provide electronic copy of the audit report to OSP@uwosh.edu at that time or via the following link: _____.

I hereby certify that I am an individual authorized by the above identified entity to complete this form. Further, I certify that the above information is true and correct and all relevant material findings contained in audit report/statement have been disclosed. Additionally, I understand this Form is to be submitted every fiscal year for which this entity is a subrecipient of federal award funds from the Department until the grant agreement is closed.

Signature of Authorized Chief Financial Officer: _____ Date: _____

Print Name & Title: _____



Subrecipient Risk Analysis*

*Form adopted from UW-Madison

Subrecipient Name:		Req #:	
Prime Sponsor:		Date Completed:	

Document Determination Process: See Pre-Award Staff for Final Determination	Step 1
1) <input type="checkbox"/> Sub-Award <input type="checkbox"/> Contractor	
2) Type: <input type="checkbox"/> FDP <input type="checkbox"/> Shared <input type="checkbox"/> Re-Grant <input type="checkbox"/> Non-FDP	

Entities Subject to Single Audit	Yes	No	Step 2
1) Is the institution subject to federal single audit? If yes, continue to #2. If no, go to "Entities not Subject to Single Audit" below.			
2) Do we have a current Audit on file for the entity? If no, acquire the audit. If yes, continue to #3.			
3) Does the audit indicate a high level of risk?			
4) Does the current Single Audit have findings that require special terms? If yes, discuss with UW Legal Counsel. If no, go to question #5.			
5) Does UWO have any negative history with the entity? If yes, discuss with OSP Director and Grants Accountant/Controller.			

Upon resolution of questions 4 through 6 above (if necessary) proceed to issuance.

Entities not Subject to Single Audit	Yes	No	
1) Do we have a current (i.e. since end of last fiscal year) Audit Certification form on file? If no, stop and obtain from the Subrecipient			
2) Does the Audit Certification reveal high levels of risk based on financial structure?			
3) Does the Audit Certification indicate special terms are needed?			
4) If entity receives more than \$750,000 in federal funds in the preceding fiscal year, does entity's audit certification indicate weaknesses in their procurement or accounting system(s)?			
5) Is the entity for-profit/industry?			
6) Is the entity located in the US?			
7) Is the entity a K-12 School or community health organization?			
8) Does the entity have a negotiated indirect cost rate agreement?			
9) Does UWO have any negative history with the entity? If yes, discuss with OSPFD Director & Controller			
10) Does the organization directly receive federal funds?			
11) Has the organization been in existence for more than 20 years?			
12) Does the organization have more than 50 employees?			
13) Is the subaward 50% or more of the total award?			
14) Is the amount of the subaward more than \$500,000?			
15) Is there a cost-share match greater than 25% of the subaward?			
16) Is the Prime award a contract?			
17) Is there a potential for conflict of interest regarding the relationship of subawardee and the PI?			
18) Are there tangible deliverables other than progress reports?			

Required Prior to Issuing Subaward:

Yes No

If subaward is federally funded, is the entity registered in SAM? If no, have entity register.		
Do either the Subrecipient or Subrecipient PI show any alerts in visual compliance? If "yes" discuss with manager.		
Is the entity presently debarred? If "yes" discuss with manager.		

Completed by: _____

Date: _____

Guidance for Determining Subrecipient vs. Contractor/Vendor

Proper attention should be paid to the relationship. There are many ways to work with third parties.

Subrecipient	Contractor/Vendor
Scope: <ul style="list-style-type: none"> • Analysis and interpretation • Question to be answered 	Scope: <ul style="list-style-type: none"> • Provides services requested by the University <ul style="list-style-type: none"> ○ Manufacture goods ○ Website hosting ○ Training services
Significant participation in the design, direction and management of the work/research	Does not participate significantly in these activities
Decision-making abilities within the terms of the agreement or award	Minimal to no independent decision-making in the design, direction, management of the work/research
Operational decisions	No operational decisions; paid only for work requested on specific deliverables
Generates and retains data	Operates in a competitive environment with similar service providers. Services are repetitive in nature and available to multiple purchasers
Key personnel likely to be co-authors on overall report	Not likely to co-author resulting publications