



Subrecipient	Vendor / Contractor
<ul style="list-style-type: none"> • Subrecipients. A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. 	<ul style="list-style-type: none"> • Vendors / Contractors. 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.
<ul style="list-style-type: none"> • Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity: <ol style="list-style-type: none"> 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) Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and 5) In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, <u>as opposed to providing goods or services for the benefit of the pass-through entity.</u> 	<ul style="list-style-type: none"> • Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the non-Federal entity receiving the Federal funds: <ol style="list-style-type: none"> 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; and 5) Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.



Eligibility Determination			
Description	Response Options		Outcome if response is "No"
1. Subrecipient vs. Vendor Determination has been completed and the entity meets the criteria for a subrecipient organization?	Yes	No	Follow procurement guidelines for vendor determination.
2. Meets the sponsor's eligibility criteria to receive a subaward?	Yes	No	Follow procurement guidelines for vendor determination
3. Has completed all required representations and certifications where applicable; including a statement of work, budget, budget narrative/justification, letter of intent, human subject and/or animal approvals, and conflict of interest?	Yes	No	Do not proceed if information is not provided.
4. Has the subrecipient organization or its PI or Co-PIs been debarred or suspended?	Yes	No	If debarred, cannot issue a subaward/subcontract
5. Has Subrecipient issued a prior subaward(s) to this entity; and if yes, were there any performance or billing issues notated in the Post Award Subrecipient Monitoring files?	Yes Yes	No No	The University may still proceed with the entity; however, should note issues with past performance.
6. Is the entity a college, university or nationally recognized non-profit organization (e.g. Salvation Army, Gates Foundation, or American Red Cross)? If no, has the entity's business organization and status been confirmed via web search, business credit report, or other reputable database?	Yes Yes	No No	If the responses are "Yes and No"; the University may still proceed with the entity; however, should note concerns.