

### Federal Subrecipient or Contractor (Vendor) Determination

Per OMB Uniform Administrative Requirement 2 CFR §200.330, UWG must determine whether a subrecipient or Contractor (vendor) relationship exists with an entity you have identified in an agreement. When determining whether an entity is a subrecipient or a contractor it is critical to use your judgment in evaluating the substance of the relationship between UWG and the entity.

Definitions:

**Subaward/subrecipient:** A subaward relationship is created for the purpose of carrying out a portion of the project and creates a Federal assistance relationship with the subrecipient, with scholarly or scientific responsibilities. This does not include an individual that is a beneficiary of such program.

**Vendor/Contractor/Professional Service:** A contract, agreement, and/or purchase order is created for the purpose of obtaining goods and services for UWG's own use or use of the beneficiaries of the program, and creates a procurement/vendor relationship with a company, merchant, or other seller providing goods or services.

Name of Organization: \_\_\_\_\_

Name of Sponsor: \_\_\_\_\_

Project Title: \_\_\_\_\_

Please answer questions below to assist ORSP in determining when an organization should be treated as a subrecipient or a contractor.

Will the collaborating organization/individual:	Yes	No
1. Determine who (within the organization) is eligible to receive what Federal funding?		
2. Have its performance measured in relation to the overall objectives of the project?		
3. Have responsibility for programmatic decision making?		
4. Considered a Co-Principal Investigator or Co-Investigator on the project?		
5. Use the Federal funds it receives to carry out a portion of the research program specified in the authorizing document (as opposed to providing goods or services for the benefit of UWG)?		
6. Provide the goods and services within normal business operations?		
7. Provide similar goods and services to many different purchasers?		
8. Normally operate in a competitive environment?		
9. Provide goods or services that are ancillary (secondary) to the operation of a Federal program?		

In making the determination of whether a subrecipient or vendor relationship exists, 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 UWG must use judgment in classifying each agreement as a subaward or a procurement contract. Use the space below to provide any additional information to aid ORSP in the determination.

Additional Comment's:

PI Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**ORSP USE ONLY**

Relationship determined to be:     Subrecipient                       Contractor

Determination made by: \_\_\_\_\_ Date: \_\_\_\_\_