

**Subrecipient or Contractor Determination Checklist**

In order to ensure Eastern Michigan University’s compliance with the Federal Uniformed Guidance’s (2 CFR 200, December 24, 2014) rules on Subrecipient Monitoring, ORDA requires that this checklist be completed prior to submitting a proposal to all Federal Sponsors. Please work with your ORDA Pre---award Officer to complete this form for each organization that would receive any “pass---through” funding for your proposed project. (Note the definitions at the bottom of page 2.)

**INSTRUCTIONS:** Please complete sections 1 and 2 of this checklist by marking all characteristics that apply to “Outside Entities” participating on the project. A checklist must be completed for each organization. Submit the form to ORDA for review and determination. This checklist assists ORDA in making a determination regarding the relationship between EMU and any Outside Entity. It also allows the University to document the decision---making process, as required by federal regulations. It is the substance of the relationship that should drive this determination. Section 3 can be used to provide any additional documentation necessary for making a proper relationship classification.

Principal Investigator: \_\_\_\_\_

Cayuse Proposal No.: \_\_\_\_\_

Sponsor: \_\_\_\_\_

Name of Outside Entity: \_\_\_\_\_

**SECTION 1 – SUBRECIPIENT**

Subawards are used in cases where a Subrecipient determination is made and a federal assistance relationship is created between the EMU and an Outside Entity for the purpose of carrying out its portion of a project funded by a federal grant or cooperative agreement. Characteristics supporting the classification of the Outside Entity as a Subrecipient, instead of a Contractor, include when the Outside Entity:

- May determine who is eligible to receive what Federal assistance. An example may be when an entity can decides what teacher may participate in a program (funded by a grant), and they will receive federal funding under the grant.
- Has its performance measured in relation to whether objectives of a Federal program are being met. The Prime Recipient is dependent upon receiving information and data from the Outside Entity in order to complete the reporting requirements.
- Has responsibility for programmatic decision making. If the Outside entity is charged with developing an aspect of the program and will use its own judgement, expertise, and discretion to do the work.
- In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statue, as opposed to providing goods or services for the benefit of the Prime Grantee (EMU). The funds are used to carryout a program or scope of work designed to benefit society as opposed to simply carrying out work to create profit.
- Entities that include these characteristics are responsible for adherence to applicable Federal program requirements specified in the Federal Award.

