

Subrecipient Statement of Collaborative Intent (SSCI)

COMMENTS

Part III: Vanderbilt University DEPARTMENT COMPLETES - REQUIRED

SUBRECIPIENT VS. CONTRACTOR DETERMINATION

The Office of Management and Budget's (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (commonly called "Uniform Guidance") requires that a pass through entity must make a case-by-case determination whether each agreement it makes with another entity is a subrecipient or a contractor.

- This is a significant decision because it determines the allocation of responsibilities to the other entity and influences the appropriate application of Vanderbilt University's F&A rates.
- In the case of a subagreement, it is incumbent upon the prime recipient (Vanderbilt University) to ensure that subrecipients conduct their portions of research projects in compliance with all applicable terms and conditions of awards and subawards and that project costs incurred by subrecipients are reasonable and allowable.
- Agreements with contractors (vendors) for the purchase of services, however, typically do not bind vendors to the full set of sponsor terms and conditions, and are subject to competitive bidding procurement practices, to assure that funds paid to vendors do not exceed fair market value.

Subagreements should have a detailed scope of work and a budget that specifies salary, fringe, supplies, and other direct costs, as well as appropriate F&A costs consistent with the subrecipient's indirect cost rate.

- Terms and conditions from a prime award are typically imposed on the subrecipient to the same degree that they are imposed on Vanderbilt University as the prime recipient.

Principal investigators and *local grant administrators* are responsible for seeking advice when determining whether an entity that will assist with research under a sponsored award represents a subrecipient or a vendor. Advice may be sought from SPA. For assistance, refer to checklist, click [here](#).

I have reviewed the information on subrecipients and contracts, and I have determined that for the purposes of this proposal, this organization should be categorized as a subrecipient.

PLEASE SIGN AND DATE:

PI or PI-designee NAME (PRINT): _____

PI or PI-designee SIGNATURE: _____

DATE: _____ / _____ / _____