

Pre-Award Procedures – Sub-Recipient Monitoring:

Initial Notice of Subrecipient:

- Verify the entity project role determination - subrecipient or contractor.
 - Resource: S:\bs\common\users\SPS\SPS Collaboration\Subrecipient Monitoring\Tools and Resources\Checklist to Determine Subrecipient or Contractor Classification.pdf
- Obtain all subrecipient(s) contact information (PI and administrative contacts) from the Purdue PI.

Determine the Type of Subrecipient:

- FDP Expanded Clearinghouse Institution – Search the FDP Expanded Clearinghouse to verify if the subrecipient is a participant: <https://fdpclearinghouse.org/>
- Low Risk Subrecipient – Not a potential high risk entity or an FDP Expanded Clearinghouse Institution
- Potential High Risk Entity - Foreign, Start-Up, No Prior Experience, PI COI

Collect Documentation from the Subrecipient for the Proposal:

It is suggested that this be completed as early as possible, at least 3 weeks prior to the sponsor deadline to allow the subrecipient to meet their internal deadlines.

- Determine if an entity profile is needed.
 - Resource: S:\bs\common\users\SPS\SPS Collaboration\Subrecipient Monitoring\Tools and Resources\ Guidelines and Procedures for Subrecipient Commitment Forms.docx
- Email the subrecipient contact requesting the following:
 - **Include a deadline** for the subrecipient to provide the information to Purdue.
 - Entity Profile form (if needed) – Attach blank form to email.
 - Letter of Intent (LOI) (with applicable project information completed*) – Attach to email.
 - Statement of Work (SOW) - The SOW provides sufficient detail of the technical and programmatic work to be accomplished by the Subrecipient. It should not be the overall project SOW.
 - Budget (send blank sponsor form if applicable)
 - Budget Justification
 - Other required sponsor documents as necessary (biosketch, current and pending, letter of support, etc.)

*The LOI should be completed to include the Purdue/project specific information at the top of the form. The subrecipient total budget/cost share amounts may also be included if predetermined by the Purdue project team.

PI Review of Subrecipient Documentation:

- Send the SOW, Budget, and Budget Justification to the Purdue PI for validation. The PI should review to ensure the proposed work and accompanying budget match expectations.

Budget Preparation & Review:

- Budget the entity in accordance with their role.
 - Subrecipient = When using an MTDC base, budget the first \$25,000 with Purdue F&A. The remainder should be budgeted without Purdue F&A.*

*The first \$25,000 applies to the total budget over the full project period. For example: If the subrecipient budget is \$200,000 over 4 years (\$50,000 per year), F&A would only be applied to \$25,000 of the first year budget. The remaining \$25,000 would not be included in the F&A base in year one. None of the subrecipient budget would be included in the base in years 2-4.

- Verify the appropriate F&A rate is used by the subrecipient (negotiated or de minimis). If the subrecipient does not have a federally negotiated F&A rate, they should include the 10% de minimis rate or provide evidence that they do not wish to claim it.
- Verify the subrecipient has appropriately applied fringe benefit rates.

Compliance Review:

- Review for debarred status (either in FDP Entity Profile or on the received Entity Profile). If debarred, advise the PI that they may need to find a replacement subrecipient if the status does not change prior to award.
- Check the LOI for Human Subjects or Animals. Flag as applicable in Coeus.
- Verify if the Subrecipient has compliant FCOI policy (Section D of Entity Profile, FDP Certifications Tab, FDP FCOI Clearinghouse). If not, include the PI and any other listed senior personnel in the PDD.

Finalize Documentation:

- As applicable, send the entity profile form to the SPS Operations Coordinator.
- Upload the LOI, SOW, Budget, and Justification to Coeus.
- Flag for potential high risk subrecipient on the route sheet (if applicable).
- Follow up with the subrecipient if the Entity Profile was not received.