

Guidelines & Procedures for Subrecipient Commitment Forms

Includes Entity Profile/LOI and Subrecipient Commitment Forms

The purpose of this document is to outline the procedures for completing and maintaining subrecipient commitment forms (when Purdue is the subrecipient) and sending and maintaining entity profiles/letter of intent (when Purdue is the pass-through entity).

Outgoing (Purdue is the Pass-Through Entity (PTE)):

Determine Type of Subrecipient:

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

FDP Expanded Clearinghouse Institution:

Pre-Award Procedures

- Obtain LOI from Subrecipient. A template LOI is available in the Subrecipient Monitoring Tools & Resources. Pre-Award should complete the Pass-Through Entity details prior to sending to the Subrecipient.
 - The completed LOI should be saved in the Coeus record.

Post Award Procedures:

- Use the FDP Expanded Clearinghouse Entity Profile and the LOI obtained at the time of proposal to complete the Subrecipient data fields in SAP.

Low Risk Entity:

Pre-Award Procedures

- Check the Subrecipient Risk Analysis Portal for a valid (received within the past 12 months) Subrecipient Entity Profile. If a valid profile is not available, send the form to the Subrecipient to collect the entity profile details.
 - Once received, send the entity profile form to the SPS Operations Coordinator. The SPS Operations Coordinator will upload to the Subrecipient Monitoring Portal.
- Obtain LOI from Subrecipient. A template LOI is available in the Subrecipient Monitoring Tools & Resources. Pre-Award should complete the Pass-Through Entity details prior to sending to the Subrecipient.
 - The completed LOI should be saved in the Coeus record.

Post Award Procedures

- Check the Subrecipient Monitoring Portal for a valid (received within the past 12 months) Subrecipient Entity Profile. If a valid profile is not available, send the form to the Subrecipient to collect the entity profile details.
 - Once received, send the entity profile form to the SPS Operations Coordinator. The SPS Operations Coordinator will upload to the Subrecipient Monitoring Portal.
- Confirm the Subrecipient should still be considered Low Risk with the Subrecipient Risk Analysis.

Potential High Risk Entity:

Pre-Award Procedures

- Check the Subrecipient Risk Analysis Portal for a valid (received within the past 12 months) Subrecipient Entity Profile. If a valid profile is not available, send the form to the Subrecipient to collect the entity profile details.
 - Once received, send the entity profile form to the SPS Operations Coordinator. The SPS Operations Coordinator will upload to the Subrecipient Monitoring Portal.
- Obtain LOI from Subrecipient. A template LOI is available in the Subrecipient Monitoring Tools & Resources. Pre-Award should complete the Pass-Through Entity details prior to sending to the Subrecipient.
 - The completed LOI should be saved in the Coeus record.
- Flag as Potential High Risk on the Route Sheet and note reasons why in the comments (PRE-AWARD POTENTIAL HIGH RISK IDENTIFIERS = Foreign, Start-Up, No Prior Experience, PI COI)
- Make the PI aware of the potential High Risk status.

Post Award Procedures:

- Check the Subrecipient Risk Analysis Portal for a valid (received within the past 12 months) Subrecipient Entity Profile. If a valid profile is not available, send the form to the Subrecipient to collect the entity profile details.
 - Once received, send the entity profile form to the SPS Operations Coordinator. The SPS Operations Coordinator will upload to the Subrecipient Monitoring Portal.
- Confirm the Subrecipient should be considered High Risk with the Subrecipient Risk Analysis.

Incoming (Purdue is the Subrecipient):

- All incoming Subrecipient Commitment forms should be routed to the SPS Operations Coordinator for completion. (Back-up - Director of the area in receipt of the form.)
 - SPS Operations Coordinator completes the form within 48 hours.
 - The most recent FDP Entity Profile should be used as a guide to complete the form.
 - FAQs should be captured with responses in order to consistently respond to questions not addressed in the FDP Entity Profile.
 - Coeus should be used to provide specific details.
 - Any project specific questions not answered via Coeus data should be directed to:
 - Pre-Award Specialist if in Proposal or Negotiation stage.
 - Post Award Research Administrator if in Award stage.