

## Pre-Award Procedures – Sub-Recipient Monitoring:

### **Initial Notice of Subrecipient:**

- Verify the entity project role determination - subrecipient or contractor.
  - Resource: K:\\_DeptAll\PreAward\Subrecipient Documentation\ Subrecipient vs Contractor.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: K:\\_DeptAll\SPS Collaboration\Subrecipient Monitoring\Website\CURRENT FOLDER\ 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.