Use of Subcontracts:
Subaward and Subrecipient Monitoring Policies and Procedures 2011
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Overview

This policy defines subaward administration through the Office of Sponsored Projects (OSP) and distinguishes it from other procurement actions. When the University is awarded a sponsored project agreement in which a substantial portion of the work will be accomplished by another institution or organization, the policies and procedures set forth in this Section apply. The policy describes the roles of the parties involved in proposal, issuance, oversight, and closeout of subawards, including the responsibilities of assessing and overseeing risk associated with a given subrecipient, audit oversight, monitoring subawards, review and processing of invoices, proper management of equipment purchased, fabricated or otherwise acquired under subawards, application of F&A costs, subaward reporting, and close-out. Links to associated forms and detailed procedures are also provided.

Subaward Definitions

Subaward

A subaward transfers a portion of the research or substantive effort of the prime award to another institution or organization. It is a written agreement with a third party for the acquisition of services or goods, or for the conduct of prescribed activities or functions under the prime award where the subrecipient has responsibility for programmatic decision making and measurable performance requirements related directly to the prime award. A subaward is written under the authority of, is consistent with the terms and conditions of the prime award (a grant, contract or cooperative agreement).

Pass-through Entity (Prime recipient)

A pass-through entity is a non-federal entity that provides an award to a subrecipient to carry out programmatic effort under a Brown sponsored project. The pass-through entity assumes responsibility for negotiation, issuance, oversight, and management of a subaward. The pass-through entity assumes many of the responsibilities typically assigned to a prime sponsor in issuance and oversight of an award to a grantee or contractor, including verification of the financial viability, adequacy of compliance controls and audit status of its subrecipients as well as oversight and verification of the subrecipient's fulfillment of its portion of the programmatic effort.

- Brown serves as the pass-through entity for subawards issued under its awards. Brown's sponsor may be a prime sponsor, or may be a higher-level tier subrecipient (who, in turn, acts as a pass-through entity).

Subrecipient

A subrecipient is a non-Brown entity that receives subawards from Brown to carry out programmatic effort under a Brown sponsored project. Examples of subrecipients include: another educational institution, an independent laboratory, a foundation, a for-profit corporation, a non-profit corporation or other organization, and may be a domestic or a foreign entity. Ordinarily, Brown does not issue subawards to individuals.

Lower-tier subrecipient

A lower-tier subrecipient is an entity which receives funding from the subrecipient for the performance of substantive work.
Appropriate Use of Subawards

A subaward is appropriate to use if the following conditions are met:

1. the scope of work to be performed utilizes the facilities, employees and/or resources of the subawardee;
2. the subawardee is contributing substantively to the scholarly/scientific conduct of the project as described in the scope of work and has responsibility for programmatic decision making, performance is measured against whether the objectives of the sponsored program are met, for example, may participate in writing technical progress or final reports;
3. the subawardee will provide unique knowledge and expertise to the project and conduct the work independent of Brown’s direct supervision or control with only general technical direction and coordination exerted by the Brown PI; and
4. the subawardee, as part of its primary business operations, does not provide the same goods and services to others and will be using the subaward funds to carry out a program of the subawardee organization rather than provide goods and services to complete a program for the sole benefit of Brown University (e.g., purchase, fabrication or repair of equipment, data processing, routine analytical or testing services).

A subaward is not appropriate to use if:

1. the agreement is for the provision of goods or services within the organization’s normal business operations;
2. the organization provides similar goods or services to many different customers;
3. the organization operates in a competitive environment for the provisioning of the goods or services to be procured;
4. providing goods or services are ancillary to the operation of the sponsored program; or
5. the organization is not subject to the compliance of the sponsored program terms and conditions.
Subrecipient Monitoring Policy

This policy provides information to assist Brown faculty and staff in understanding the requirements imposed on pass-through entities and to assist in complying with such requirements. In summary, Brown University is responsible for:

- informing subrecipients about certain information related to the awards received, including applicable federal and non-federal requirements
- monitoring subrecipients’ activity
- ensuring that subrecipients meet the requirements of OMB Circular A-133

OMB Circular A-133 - Audits of States, Local Governments, and Non-profit Organizations available at http://www.whitehouse.gov/omb/rewrite/circulars/a133/a133.html assigns certain responsibilities to primary recipients of federal awards that issue subawards to other organizations. The policy mandates subrecipient monitoring ensures the following:

- the subrecipient entity complies with the auditing requirements of OMB Circular A-133
- the subrecipient entity uses the funds appropriately and
- performance goals are achieved.
Roles and Responsibilities of Pass-through Entities

OSP will:

- Survey subrecipients to determine if they are required to have an A-133 audit.
- Incorporate into all appropriate subcontracts a clause referring to the requirements of OMB Circular A-133. This clause will be non-negotiable. It will require that the subrecipient permit independent auditors to have access to its records and financial statements as necessary for Brown to comply with OMB Circular A-133. It will also require that the subrecipient send a letter communicating the results of its annual audit and, if there are applicable findings, copies of audit reports and any related notices of noncompliance and corrective action plans to Brown’s OSP for review.
- Monitor OMB Circular A-133 audit reports or other relevant information from the subrecipient.
- Review subrecipients’ audit reports for findings that could have possible implications for Brown as the prime.
- In cases of potentially relevant findings, invite the Brown PI to participate, along with the OSP Managing Director, an Internal Auditor and others to discuss the findings and determine an appropriate plan of action.
- Annually request A-133 compliance information from those subrecipients who have not yet submitted previously requested information.
- Verify that the required subrecipient audits were completed. For subrecipients that are not required to submit a copy of the reporting package to Brown because there were “no audit findings”, Brown may use the information in the Federal Audit Clearinghouse (FAC) database (available on the Internet at http://harvester.census.gov/sac) as evidence to verify that the subrecipient had “no audit findings” and that the required audit was performed. This FAC verification would be in lieu of reviewing submissions by the subrecipient to Brown when there are no audit findings.

Subrecipient Monitoring Forms are available at http://www.research.brown.edu/rschadmin/osp_subawards.php

- Subrecipient Profile Questionnaire
- Confirmation for Subaward Initiation/Modification
- Subaward Close-out Certification

Subrecipient Monitoring Procedures

When there is a subaward under a new award, OSP Contract Administrator will determine which of the following scenarios applies:

1. Active subawardee with complete and up-to-date organizational data – proceed with subaward issuance.
2. Subawardee with incomplete or missing organizational data or new subawardee

Contract Administrator will request from the subawardee

- Subrecipient Profile Questionnaire - to be completed and submitted by subawardee before Brown issues a subaward, to conduct a risk analysis to determine if a subrecipient can administer a federal or non-federal award in compliance with federal or other requirements. The questionnaire should be sent out to an entity once in 3 years.
- Subrecipient A-133 Audit Certification Request - to be completed by subawardee annually.
- Subrecipient’s current F&A Rate Agreement

The information will be entered to the Subaward tracking spreadsheet: “Subrecipient Monitoring_A133, SubProf, F&A” which is housed on the OSP shared drive.
Subawards not originally included in the funded proposal are created upon receipt at OSP of the Confirmation for Subaward Initiation/Modification form. Form is available on the OSP web page.

Managing High Risk Subrecipients

Risk Analysis is performed by OSP which appraises subrecipient information such criteria as:

- Prior Audit Findings
- Foreign vs domestic
- For-profit vs non-profit
- Large subaward ($) or high % pass-through
- Date of entity’s incorporation or founding
- Individual or Organizational conflict of interest
- Existence of financial controls in systems and administration

Irrespective of the funded value of a subaward the following requirements should be addressed prior to issuing the subaward:

- Review of the debarred and suspended list (performed by Brown Purchasing Department) and a certification statement in the subaward indicating that the subrecipient is not debarred or suspended from receiving federal funds and requiring notification to the institute if its status should change
- Certification statement in the subaward indicating that the subrecipient will notify Brown if it becomes subject to OMB Circular A-133
- Submission of audited financial statements
- Completion and review of Subrecipient Profile Questionnaire
- Submission and review of findings in any audit which impact the fiduciary management of the subaward
- A statement in the subaward notifying the subrecipient that non-compliance with the terms and conditions of the subaward may result in the withholding of payment and/or immediate termination.

High Risk Subrecipients may include those organizations that are not subject to OMB Circular A-133:

- for-profit organizations
- non-profit organizations not meeting the federal expenditure threshold of $500,000 per fiscal year
- foreign institutions.

Once an entity is identified as high risk, more frequent oversight is required throughout the life of the subaward. OSP will work closely with a PI to learn in greater detail about the nature of the work being performed and the subrecipient’s technical and business capacity to perform. Corrective action plans for identified high risk areas may be requested.

During the term of a subaward, the PI is responsible for monitoring the activities of subrecipients, as necessary, to ensure that federal awards are being used for their authorized purpose and that performance goals are achieved. In doing so, the PI and Department Administrator (DA) are required to review and approve all technical and financial reports. PI or departmental concerns regarding the contents of any required report (s) must be brought to the attention of OSP. The PI’s ongoing responsibilities are detailed in the PI Subrecipient Monitoring Responsibilities Memorandum (Appendix A).

If during the term of a subaward OSP determines that an annual report or other provided information includes audit findings or material non-compliance with federal laws and regulations, OSP will discuss the findings with the PI and the responsible DA to determine an appropriate plan of action.
In cases where any of the following indicate additional risk, stricter subaward terms & conditions and increased monitoring conditions may be imposed such as:

- Payments made on a milestone rather than cost-reimbursement basis
- Reimbursement based upon receipt of detailed invoices with supporting back-up documentation
- Restriction of certain budget categories, rebudgeting or carry-forward of funds
- Site visits to subrecipient to review financial systems and administrative operations and back-up documentation to support invoiced expenditures, observe programmatic operations and project performance for deliverable requirements

At the conclusion of the subaward activity OSP requests **Subaward Close-out Certification**. The form should be completed and returned to OSP for final close out of the subaward.

**Procedures**

**New Subawards**

**What to Do at the Proposal Stage**

The determination of the potential need for a subaward to a business/organization is normally made at the proposal stage. The subrecipient's proposal to Brown should contain sufficient information to justify their selection. When selecting a potential subawardee, the PI should be aware of the 'Codes of Conduct' section (Subpart C.42) of OMB Circular A-110 ("Uniform Administrative Requirements for Grants and Agreements for Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations") which states the following:

"___.42 Codes of conduct.  The recipient shall maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts.  No employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict of interest would be involved.  Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award.  The officers, employees, and agents of the recipient shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to subagreements.  However, recipients may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value.  The standards of conduct shall provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the recipient."

The proposal package submitted to OSP in which a potential subawarddee is identified requires the inclusion of the following:

**Letter of Intent**

**Letter of intent must be signed by the subawardee authorized representative**

and should include:
Policy

- the subawardee PI’s signature
- intent to accomplish the work as outlined in the scope of work
- project title
- period of performance
- funds requested
- (for PHS proposals) the following confirmation: “the appropriate programmatic and administrative personnel of each organization involved in the application are aware of the PHS consortium grant policy and are prepared to establish the necessary inter-institutional agreements consistent with that policy”.

See Appendix B for a template of the letter of intent.

**Budget** consists of subawardee total costs, which includes direct and F&A costs, if applicable.

- **Direct Costs** should be itemized by major cost categories, e.g., salary, fringe benefits, equipment, travel, etc. Include sufficient justification and basis for each cost element such as % effort, hourly rates, or vendor quotes.

- **F&A costs** must be based on a valid current F&A Rate Agreement with the Federal government. The purpose of the F&A Agreement is to verify the F&A rate and Fringe Benefit rates used in the budget are correct for the identified project period.
  - The current F&A rate must be on file at OSP, or provided with the subawardee proposal.

**Scope of work** outlines the technical and programmatic work to be accomplished by the subawardee.

**Additional Information:**

Sponsor proposal preparation guidelines or special program announcements may require additional information:

- biographical sketches
- current and pending support
- facilities and resources
- post-doc mentoring plan (NSF)

**Proposal Revision:**

Any revised documentation from the potential subawardee must be forwarded to OSP for Brown University signature prior to submission to the sponsor.

**What to Do at the Award Stage**

When there is a subaward under a new award, OSP Contract Administrator will confirm via e-mail to the PI/DA if:

- the award is funded as proposed or revised, the subaward will be based on the information provided by the subawardee. PI/DA confirms that there are no changes, OR

- the award is not funded as proposed or revised, a modified budget and scope of work must be provided to OSP.

- The following is a sample of the email content:
Upon receipt of PI/DA subaward confirmation, the following steps are taken by OSP Contract and Subrecipient Administrator to create each subaward. (see attached Subaward Initiation/Modification Checklist)

Issuance of Subaward

1. **Subawardee Initiation/Modification Checklist:**
   Contract and Subrecipient Administrator verifies:
   
   - If the subcontractor is in COEUS Organization table. If the subcontractor is not in the COEUS Organization table, request that the Coeus Administrator add it as a new Organization in COEUS.
   - F&A rates used correspond to current rate agreement
   - Subrecipient Profile Questionnaire is complete
   - A-133 audit reports/certifications on file
   - If applicable:
     - IRB or IACUC approvals - should be submitted by the subawardee to Brown Research Protections Office (RPO).
   - If FFATA or ARRA reporting is required.

2. **Creating a Web Requisition:**
   a. Once an account is established, create a Web Requisition at [http://brown.edu/Administration/Purchasing/](http://brown.edu/Administration/Purchasing/) to obtain PO number from Purchasing Department. Web Requisition Training Manual is available at [http://brown.edu/Administration/Purchasing/training/](http://brown.edu/Administration/Purchasing/training/).
   b. Web requisitions must include the following information:
      - official subawardee name and address (from Organization table in Coeus)
• account number and sub-code 9420 (for organizations/businesses), or 9440 (for hospitals)
• period of performance
• subaward cost

After 1-2 business days, check Web Requisition system for PO number to input into COEUS (the requisition number may be used in place of the PO number temporarily until the PO number is available).

3. **Creating Subaward Record in COEUS:**

Refer to “Subaward Guide” available at [http://research.brown.edu/osp/coeus/Subcontracts/Subindex.html](http://research.brown.edu/osp/coeus/Subcontracts/Subindex.html) to create subaward record into COEUS.

4. **Creating Subaward Agreement in COGNOS:**

   a. For subawards under grants or cooperative agreements (assistance)
      • *Allow 1 business day after creating the subaward record in Coeus before running a report in Cognos.*

   b. For subawards under contracts (procurement)
      • Select and modify as appropriate subcontract template available on S:\Shared\Subawards & Subrecipient Monitoring\Templates as applicable.
      • If no template is available, review prime agreement for appropriate flow-down terms.

   c. Create a unique folder on the shared drive at S:\Shared\Subawards & Subrecipient Monitoring\Subawards. Use the following convention: Brown PI last name account number subawardee name subcontract number e.g. “Smith 526000 Harvard 315”
      (1) A copy of the finished document should be saved here along with any other versions/revisions and the final, fully executed copy.

**Representations and Certifications:**

If Reps and Certs are required as mandatory flow down clause OSP will request completed form from the subawardee when sending subcontract to subcontractor for signature.

5. **Finalizing and Issuing Subaward:**

   a. E-mail the signed subaward agreement to the subawardee for signature, and cc the Brown PI and the DA. Upon subawardee’s request OSP will send hard copy originals. Below is a sample of the email content:

   b. OSP is responsible for all negotiations of the subaward and any changes to the subaward document requested by the subawardee must be approved by OSP (with the PI’s involvement, if necessary).

   c. Once terms are finalized, Subawardees are requested to return a fully executed subaward agreement to OSP via e-mail.
      • Fully executed originals, scanned, or faxed subaward agreements are acceptable.

   d. A fully-executed subaward agreement along with the original PO are retained and filed by OSP.

   e. A copy of the fully executed subaward along with a copy of the PO are e-mailed to the PI and DA for their records. This will include PI Subrecipient Monitoring Responsibilities Memorandum. Blue copy of the PO is mailed via campus mail to DA.
f. Once fully executed subcontract and PO are received, under “Subcontract” tab in Coeus, change the “Status” from “Pending” to “Active”.

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**Subaward Modifications**

When Brown receives an award modification that includes a subaward, OSP Contract Administrator will notify the department via e-mail (as indicated in the section on new subawards) and request that the department submit a Change Order to OSP. The Change Order should indicate how the subaward should be modified. Attach supporting documentation for any changes to the subaward if different than what was proposed.

Subaward modifications are used to extend the period of performance, to increase the funded amount to append additional tasks to the Scope of Work, or modify other terms and conditions.

Certain agencies retain prior approval for subawardee actions. These requests must be submitted through OSP for approval. Examples include:

- Prime awards which restrict carry-forward of year end balances
- Change in subawardee key personnel.

**Subaward Modification Procedures:**

1. **Review and approve the Change Order and send it to Purchasing**
   - Refer to Subaward Modification Checklist

2. **Subawardee Initiation/Modification Checklist:** Using the checklist, do the following:

3. **Update Subaward Record in COEUS:**
   
Section 6.5 to modify subaward information in COEUS.

4. **Creating Subaward Modification in COGNOS:**
   - Allow 1 business day after modifying the subaward record in Coeus before running a report in Cognos.
   - Save a copy of the final modification document on the shared drive in the same unique folder created for the original subaward.

5. **Finalizing and Issuing Subaward Modification:**
   - E-mail the signed subaward modification to the subawardee for signature, and cc the Brown PI and the DA. Upon subawardee’s request OSP will send hard copy originals. Below is a copy of the email content:

   ```plaintext
   RE: Subcontract # mod #,

   Attached is the above-referenced sub-award modification on behalf of Brown University. Please complete the following:
   - Have the appropriate official sign and date the agreement
   - Return the signed document as a PDF

   If you require a signed original document for your records such arrangements can be made upon your request, otherwise both parties agree to treat the fully executed PDF as an original. If you have any questions, or if I can be of further assistance, please do not hesitate to call me at (401) 863-9328 or e-mail me at Subawards@brown.edu.

   Sincerely,
   ```

b. OSP is responsible for all negotiations of the subaward and any changes to the subaward document requested by the subawardee must be approved by OSP (with the PI’s involvement, if necessary).

c. Once terms are finalized, Subawardees are requested to return a fully executed subaward modification to OSP via e-mail.
   - Fully executed originals, scanned, or faxed subaward modifications are acceptable.

d. A fully-executed subaward modification along with the amended PO are retained and filed by OSP.

e. A copy of the fully executed subaward modification along with a copy of the amended PO are e-mailed to the PI and DA for their records. Blue copy of the amended PO is mailed via campus mail to DA.

f. A copy of the modification documents are saved in the unique folder on the shared drive.
Invoices

The subrecipient is instructed to mail invoices (not more frequently than monthly) directly to the responsible PI and DA. The PI must review and approve the invoices. For specific details refer to PI Subrecipient Monitoring Responsibilities Memorandum. DA forwards to Accounts Payable for payment.

Subaward Close-out/Termination Actions

1. Close-out at prime award termination:
   a. OSP Grant/Contract Accountant confirms with the department that all required reports have been received and accepted and the final invoice has been received and approved.
   b. The Subaward Close-out Certification form is completed and signed by the PI and returned to OSP Grant/Contract Accountant.
   c. DA sends a change order to Purchasing requesting that the PO be closed.
   c. A weekly report is generated that identifies awards that are closed and have active subcontracts in Coeus.
      • Change status from “Active” to “Closed” in “Subcontract” module in Coeus.

2. Close-out of the subaward during life of the prime award:
   a. OSP verifies with the department whether a subaward is continuing or closing.
   b. If closing, OSP confirms with the department that all required reports have been received and accepted and the final invoice has been received and approved.
   c. The Subaward Close-out Certification form is completed and signed by the PI and returned to OSP.
   d. DA sends a change order to Purchasing requesting that the PO be closed.
   e. Change status from “Active” to “Closed” in “Subcontract” module in Coeus.

3. Termination Prior to Subaward End Date:
   a. The termination request form is completed and signed by the PI and submitted to OSP Contract and Subrecipient Administrator.
   b. OSP Contract and Subrecipient Administrator reviews the request to determine appropriate actions. If necessary, department prepares Termination letter and submits to OSP for review and signature. OSP then forwards to subawardee, copying the PI and DA.
   c. If proceeding with termination:
   d. OSP confirms with the department that all required reports have been received and accepted and the final invoice has been received and approved.
   e. The Subaward Close-out Certification form is completed and signed by the PI and returned to OSP.
   f. Department sends a change order to Purchasing requesting that the PO be closed.
   g. OSP prepares subaward modification terminating the subcontract according to the steps outlined above.
Appendix A

PI Subrecipient Monitoring Responsibilities Memorandum

When a subaward is issued under your sponsored award, the Institution, as the prime grantee, and you, as principal investigator/project director, have certain obligations for oversight of the entire project. As the person who would most likely be familiar with the subawardee’s performance through e-mail/telephone conversations, technical meetings, progress reports, or site visits, the obligations of the principal investigator/project director include appropriate monitoring of a subawardee’s performance and costs. The following guidelines have been developed to assist in you in the fulfillment of this responsibility.

As the subawardee is required to submit periodic invoices to you for review, approval, and payment authorization, your responsibilities with regard to the review and approval of the invoices include the following:

1. Prior to your approval, you should review the invoice to determine that the amount being requested for payment is consistent with the accomplishments of the subawardee during the billing period.

2. If you believe there are problems with the invoice, such as equipment purchased without any required prior approval or more labor charged than you believe was expended, you should not approve the invoice for payment. Rather, you should consult with your department administrator and the Office of Sponsored Projects to resolve these issues.

3. Should it be necessary to terminate the award early, you should immediately notify the Office of Sponsored Projects in writing. We will then coordinate the termination with you.

4. Final invoices are only to be approved and signed off by you for payment if you are satisfied that the subawardee has completed its performance under the award, submitted all required reports and/or other deliverables, and that the costs incurred are appropriate for that performance.

If you have any questions about your obligations with respect to monitoring of a subawardee’s performance and costs, please feel free to contact the OSP Subaward Administrator via email at subawards@brown.edu.

cc: Department/Administrative Unit Administrator
Dear Ms. :

Brown University on behalf of (Brown PI’s name)__________________ is pleased to offer our support in (Prime PI’s name’s)________________________ proposal entitled, “Title”. Brown PI’s name, Professor of __________ will serve as the Principal Investigator at Brown University. The proposal period of the subaward is to . The total costs for Brown University are $. This amount includes $____ direct costs and $____ indirect costs.

The responsible grants and contracts contact for this proposal is __________, Contract Administrator, Office of Sponsored Projects, Brown University, Box 1929, Providence, RI 02912. Please address any questions regarding this proposal and payment information to her. She may be reached by telephone at (401) 863-XXXX, by fax at (401) 863-7292, or via email at __________@Brown.edu.

Sincerely,

Michael Kostyshak
Assistant Director
Office of Sponsored Projects
## Roles and Responsibilities

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<th>Lifecycle of Subs</th>
<th>Activity</th>
<th>Dept/PI</th>
<th>OSP</th>
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<td>Validate/Verify the subcontractor</td>
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<td></td>
<td>Identify contact personnel</td>
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<td>Receive a Letter of Intent</td>
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<td>Receive a Scope of Work</td>
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<td>Receive a project budget</td>
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<td><strong>Award Stage</strong></td>
<td>Subawardee Checklist</td>
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<td>Identify any necessary changes</td>
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<td>Establish a Purchase Order (PO)</td>
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<td>Execute the agreement</td>
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<td>Receive Technical reports</td>
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Subcontracting Forms

- Subrecipient Profile Questionnaire
- Confirmation for Subaward Initiation/Modification
- Subaward Close-out Certification
- OSP Subaward Checklist
Subrecipient Profile Questionnaire

Please fill out the information below, as appropriate, and submit to:

Office of Sponsored Projects
164 Angell Street, Box 1929, Providence, RI 02912

1. Please provide complete subrecipient's business information:
   Organization Name: _________________________________________________________
   Address: ___________________________________________________________________
   City, State, Zip: _____________________________________________________________
   Phone: __________________ Fax: ___________________
   Email: __________________ URL: __________________
   EIN/DUNS Number: _________________________________________________________
   (if applicable)

2. What is the subrecipient's classification? (Check only if applicable)
   - Large Business
   - Veteran-Owned
   - Small Business
   - Government Entity
   - Historically Black College / University
   - Small Disadvantaged Business
   - Tribal
   - Historically Underutilized Business Zone
   - Woman-Owned
   - Volunteer Organization
   - Minority Institution / Owned

3. What is the subrecipient's fiscal year? From: ______________________ To: ______________________

4. Does the subrecipient have a designated Federal cognizant audit agency?
   - Yes
   - No If yes, please provide the name of the agency:

5. Does the subrecipient have a negotiated Federal Facilities and Administrative rate (IDC)?
   - Yes
   - No If yes, please attach a copy of your current rate agreement or the URL. If no, please provide the documentation to substantiate the proposed rate (i.e., breakdown of rate components).

6. Is the subrecipient required to comply with OMB Circular A133?
   - Yes
   - No If yes, please complete the remaining questions below, skipping the next question # 7.

   A133 Contact Name: _________________________________________________________
   Title: _____________________________________________________________________
   Address: ___________________________________________________________________
   City/State/Zip: _______________________________________________________________
   Email: __________________ Phone: ________________________________

7. Will the subrecipient adhere to Cost Accounting Standards Board (CASB) regulations under the proposed subaward (FAR Part 30)? (Refer to http://www.arnet.gov/far/current/html/Subpart_30_1.html)
   - Yes
   - No
8. Does the subrecipient have annual financial statements that have been audited by an independent audit firm? 
   *If yes, please mail a copy of the statements for the most current fiscal year to the address indicted above and complete the remaining questions.*
   
   □ Yes  □ No

9. Does the subrecipient’s financial management systems provide for the control and accountability of project funds, property, and other assets?
   
   □ Yes  □ No

10. Does the subrecipient have a formal, written personnel policy that addresses the following:
   
   - Pay Rates and Benefits  □ Yes  □ No
   - Time and Attendance  □ Yes  □ No
   - Leave  □ Yes  □ No
   - Discrimination  □ Yes  □ No
   - Conflict of Interest  □ Yes  □ No

   Is subrecipient’s conflict of interest policy consistent with NIH and NSF requirements? □ Yes  □ No

11. Describe the method that the subrecipient uses to support labor and benefit charges (e.g., timesheets, % effort):

   ______________________________________________________

12. Does the subrecipient have a formal written travel policy?
   
   □ Yes  □ No

13. Does the subrecipient have a formal written purchasing procedure?
   
   □ Yes  □ No

14. Does the subrecipient maintain an inventory for Government property that identifies purchase date, cost, vendor, description, serial number, location and ultimate disposition data?
   
   □ Yes  □ No

Please provide the name and title of the appropriate individual who is able to certify to the accuracy of this completed questionnaire.

Name: ______________________________________________
Title: ______________________________________________
Signature: ____________________________________________
Date: ______________________________________________

Penalties and Remedies: Anyone who misrepresents any aspects of the status of a concern for the purposes of securing a subcontract agreement shall:

   (A) Be punished by imposition of a fine, imprisonment, or both;
   (B) Be subject to administrative remedies, including suspension and debarment; and
   (C) Be ineligible for participation in programs conducted under the authority of the Small Business Act.

If you have any questions about this questionnaire, please feel free to contact Brown University Office of Sponsored Projects at osp@brown.edu.
## Confirmation for Subaward Initiation/Modification

(Please use this form for new subawards which were not originally included into the proposal and should be issued by Brown, or in cases when a subaward should be modified per a special request, for example, additional terms and conditions or restrictions. Please provide all required back-up documentation to Contract and Subrecipient Administrator @ OSP.)

<table>
<thead>
<tr>
<th>TO:</th>
<th>FROM:</th>
<th>PHONE EXT.:</th>
</tr>
</thead>
<tbody>
<tr>
<td>RE:</td>
<td>NEW SUBAWARD</td>
<td>AMENDMENT*</td>
</tr>
</tbody>
</table>

*(Please complete Section 1, Brown Information and any other items that will change)*

### 1. BROWN UNIVERSITY INFORMATION

<table>
<thead>
<tr>
<th></th>
<th>Brown PI Name:</th>
<th>5-ledger account:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Subrecipient Name:</td>
<td>Web req./PO#:</td>
</tr>
<tr>
<td></td>
<td>Prime Agency/Sponsor Number:</td>
<td></td>
</tr>
</tbody>
</table>

### 2. SUBAWARD INFORMATION

<table>
<thead>
<tr>
<th></th>
<th>Please have Subrecipient fill out Attachment 3 – Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A-133 Audit Report Contact and Address:</td>
</tr>
<tr>
<td></td>
<td>Subrecipient is: Non-profit Entity For-profit Entity</td>
</tr>
<tr>
<td></td>
<td>Period of Performance: Start Date: End Date: Projected End Date:</td>
</tr>
<tr>
<td></td>
<td>Subaward Amount: Obligated: Anticipated:</td>
</tr>
<tr>
<td></td>
<td>Payment Terms: Cost Reimbursement Advance/Payment Schedule</td>
</tr>
<tr>
<td></td>
<td>Match/Cost Share Requirement:</td>
</tr>
<tr>
<td></td>
<td>Indirect Costs Allowed? Yes No</td>
</tr>
<tr>
<td></td>
<td>Special Reporting Requirements: Yes No</td>
</tr>
</tbody>
</table>

### 3. ATTACH THE FOLLOWING DOCUMENTS (IF APPLICABLE & IF NOT PREVIOUSLY SUBMITTED)

<table>
<thead>
<tr>
<th></th>
<th>Letter of Intent</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Scope of Work</td>
</tr>
<tr>
<td></td>
<td>Budget and Budget Justification</td>
</tr>
<tr>
<td></td>
<td>Revised budget or statement of work</td>
</tr>
<tr>
<td></td>
<td>F&amp;A Rate Agreement</td>
</tr>
<tr>
<td></td>
<td>Fringe Benefit Rate Agreement</td>
</tr>
<tr>
<td></td>
<td>A-133 Audit Report or Certification; and /or Subrecipient Profile Questionnaire, if not on file at OSP</td>
</tr>
<tr>
<td></td>
<td>IRB Approval (if Human Subjects are used), if not on file at RPO</td>
</tr>
<tr>
<td></td>
<td>IACUC Approval (if animal subjects are used)</td>
</tr>
</tbody>
</table>

Note:
- Additional requirements may apply if Brown’s award is under a contract.
- The first three items under Section 3 are required at time of proposal, the rest items are recommended at time of proposal.
4. REASONS FOR CHANGE ORDER/AMENDMENT

PLEASE SUBMIT TO THE ATTENTION OF CONTRACT AND SUBRECIPIENT ADMINISTRATOR @ OSP, BOX 1929, REQUEST TO CHANGE/AMEND OPEN/INCOMPLETE ORDERS FORM AVAILABLE AT HTTP://WWW.BROWN.EDU/ADMINISTRATION/PURCHASING/GUIDE/DOCUMENTS/CHANGEORDERNEW.DOC

<table>
<thead>
<tr>
<th>Option</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuation funding:</td>
<td>☐ New End Date: ☐ Increase/Decrease Amount: ☐ New Total Amount:</td>
</tr>
<tr>
<td>No-cost Extension</td>
<td>☐ New End Date:</td>
</tr>
<tr>
<td>Additional Funding</td>
<td>(please explain below):</td>
</tr>
<tr>
<td>Carryforward of unspent funds</td>
<td>☐ Amount of carryforward funds:</td>
</tr>
<tr>
<td>Rebudgeting</td>
<td>☐ Prior sponsor approval is required: ☐ Yes ☐ No</td>
</tr>
<tr>
<td>Close/Terminate Subaward/PO</td>
<td>☐ Yes ☐ No</td>
</tr>
<tr>
<td>Change Subrecipient Name/Address to:</td>
<td>(please type in new information below)</td>
</tr>
<tr>
<td>Other (please specify)</td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
</tbody>
</table>

I have reviewed the Subrecipient's budget (attached) and believe that all costs stated therein to be reasonable and appropriate for the work to be performed (attached). In the event this action represents an increment continuation, or no-cost extension, I am satisfied with the programmatic progress of the Subrecipient.

PI’s or Authorized Representative Signature  Date

version 10-26-09
As a sub-recipient of federal funds contracted via Brown University, your institute is required to provide certain information as directed by OMB Circular A-133 “Audits of Institutions of Higher Education and Other Non-profit Organizations.” If you are not the person responsible for the A-133 audits at your institution, please pass this request on to the Controller’s office or other responsible party. For Brown University to satisfy its A-133 audit responsibilities, please select the appropriate statement below and provide any required documents to the address below.

1. We have not yet completed our A-133 audit for fiscal year ___. Our fiscal year ends __________. We expect the audit to be completed on __________. Upon completion, we will advise you of the results.

2. We have completed our A-133 audit for fiscal year ___. Our fiscal year ends __________. The audit presented no material weaknesses, no material instances of noncompliance, and no findings related to any subaward(s) issued by Brown University. We have listed below or attached the information for each of these sub-award(s) and their expenditure amounts included in our Schedule of Expenditures of Federal Awards.

3. We have completed our A-133 audit for fiscal year ___ (indicate most recently audited fiscal year). Material weaknesses, material instances of noncompliance, or findings related to any subaward(s) issued by Brown University were noted. Attached is a copy of the audit report (or see website address: ___________________) with relevant findings and response(s) on page(s) ________.

4. We are not subject to the requirements of A-133 because:

   ___ We are a for-profit organization
   ___ We are a foreign (non US) entity
   ___ We receive less than $500,000 in total federal support annually

However, in lieu of an A-133 audit, we enclose the following for your monitoring purposes:

   ___ an audited financial statement and an independent auditor’s management letter
   ___ Other (explain) __________________________

Name/Title: ____________________________________________
Institution: ____________________________________________
Address: _____________________________________________
Phone number and email: __________________________ Date: _____________

Signature: __________________________________________
Subaward Close-out Certification

Please fill out the certification, as appropriate, and submit it to OSP Grant/Contract Accountant

Subrecipient Name: _____________________________________

Subaward Agreement # or PO#: ____________________________________

Period of Performance: ________________________

Subrecipient's (check all that apply):

☐ Final Technical Report has been submitted and is acceptable.

☐ Final Financial Report has been submitted and is acceptable.

☐ All invoices (including Final invoice) have been reviewed, approved and paid to the Subrecipient.

If required:

☐ Final Property Report is attached.

☐ Final Inventions Report is attached.

☐ Other Reports/Deliverables have been submitted and are acceptable. Please list below.

Comments: _________________________________________________________________________

_________________________________________________________________________

_________________________________________________________________________

_________________________________________________________________________

I have evaluated the final results against the scope of work, and believe that all required deliverables have been submitted.

_________________________________________________________________________

Signature of Principal Investigator                     Date
SUBAWARD CHECKLIST

Brown PI: ____________

Sponsor: ____________

Account #: ____________

Administrator: ____________

Sub-Award #: ____________

A) Monitoring:
- [ ] Sub-recipient Questionnaire
- [ ] A-133 Report
- [ ] F&A Agreement
- [ ] ARRA Y/N ____________
- [ ] FFATA: Y/N ____________
  - FSRS List Y/N ____________
  - Start Date of 10/1/2010 ____________ (Obligated...)
  - Prime Grant or Contract? ____________
- [ ] Special Circumstances / High Risk: (Foreign, Small Business, Audit Findings, etc. Explain in Notes section)

B) RPO: Y/N ____________
- [ ] Human Subjects Approval Date: ____________
- [ ] IACUC Approval Date: ____________

C) Purchase Order / Change Order: Req#: R ____________ PO#: P ____________
- [ ] Confirm Subcontract Amounts (see email from Contract Administrator)
- [ ] NEW Subcontract: Create Purchase Requisition in WebReq system
  Include the following in the body of the Req: Title, Brown PI, Sub PI, Prime Award #, “Terms of Subcontract supersede those on P.O.”
  Include the following in the line of the Req: 1 Each Period of Performance: xx/xx/xxxx – xx/xx/xxxx
- [ ] Modification to an existing Subcontract: Review/Approve Change Order Request from Department, send to Purchasing.
  Be sure to indicate change the Line to read the new period of performance...

D) Create Coeus Record / Enter new Sequence for Modifications
- [ ] Subcontract Tab
  - Keep status “Pending” until fully executed
  - Leave “Account No” field blank
  - “Subaward Type” indicate the prime award type.
  - Enter a brief description in the “Comments” field for each action, e.g. “New subcontract”; “Mod 1, increase by $x, Extend end date to xx/xx/xxxx”
- [ ] Funding Source Tab
  - Search for Prime award and Add...
- [ ] Amount Info Tab
  - Obligated and Anticipated amounts should be the same
  - “Released” field is not used.
  - Enter a brief description in comments regarding the action taken, e.g. “First year funding”, “Second year funding”
- [ ] Amount Released Tab
  - Completed automatically
- [ ] Contacts Tab (required)
  - Must have at least one contact to save record
  - Add Contacts to Rolodex as necessary
  (Closeout Tab; Not currently used)
- [ ] Others Tab
  - Current Mod Issue Date: Indicates the Effective Date of Amendment on modifications. Use start date of funding period for standard increments, use other dates as necessary, e.g. supplements, carry forward approval, etc. per Prime Sponsor requirements.
  - Current Mod Number: Be sure the numbers used are consistent with Change Order...
  - IDC Rate Type: (required field) Indicate the relevant rate type used by the Subcontractor.

version 3-24-2011
Subcontractor: ___________________________  Sub-Award #: __________

Administrator: ____________

E) **Create Subaward Document – COGNOS**
- Check WebReq System for PO# - edit COEUS to replace Purchase Requisition number with Purchase Order Number as necessary
- Include Special Terms and Conditions from Prime award that are not part of the sub-award template
- Edit document to include Purchase Order Number in place of Requisition Number if necessary
- Include Attachments: SOW and Budget as necessary
- Include FFATA/ARRA attachments as necessary
- Create a unique folder under S:\Shared\Subawards & Subrecipient Monitoring\Subawards and save a copy of the subaward document there.

F) **Issue Sub-Award Document**
- Bring Subaward Document to Authorized Brown Signatory for Review / Signature
- Send Subaward Document to Sub-awardee with standard template by email
- Request FFATA/ARRA information as necessary
- Negotiate terms if necessary saving draft versions in the unique folder created in step E).

G) **Fully Execute Document**
- Have Authorized Brown Official sign the agreement once returned to Brown with Sub-Recipient signature as necessary
- Update Rolodex with new contacts from sub-recipient as necessary
- Edit COEUS record to include all contacts
- Edit COEUS record to change Status to “Active”
- Return an original, fully executed copy to Sub-awardee by mail if so requested by Subcontractor...
- Save a copy of the fully executed subaward document in the same unique folder created in step E).
- Give file to OSP Administrative Assistant for final processing.

NOTES:
## Subrecipient Risk Analysis Category Guidelines/Examples

<table>
<thead>
<tr>
<th>Category</th>
<th>Score=0 (lower risk)</th>
<th>Score=1 (medium)</th>
<th>Score=2 (higher risk)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foreign vs Domestic</td>
<td>Domestic (US only)</td>
<td>Canada, US territories</td>
<td>All other foreign entities</td>
</tr>
<tr>
<td>Maturity of Organization</td>
<td>Mature</td>
<td>Mature but not research-oriented</td>
<td>Start-up, no fiscal controls in place yet</td>
</tr>
<tr>
<td>Subrecipient Organization Type</td>
<td>University or Non-profit (Collegial T&amp;Cs)</td>
<td>University or Non-profit with more restrictive T&amp;Cs (e.g., state regulations)</td>
<td>Industry organization</td>
</tr>
<tr>
<td>Award Type</td>
<td>Grant from federal or non-commercial source</td>
<td>Coop. agreement, U grant, Grant with Special Conditions</td>
<td>Contracts (includes subcontracts, CTAAs)</td>
</tr>
<tr>
<td>Amount/Percentage</td>
<td>Lower funding levels or percentage (e.g., &lt;$100K)</td>
<td>Funding is a large part of smaller award, needs more stringent monitoring</td>
<td>Funding level&gt;$500K or &gt;49% of award</td>
</tr>
<tr>
<td>Accounting/Procurement Systems</td>
<td>Systems have been approved (existing A-133 is an indicator)</td>
<td>Systems less qualified to handle large amounts of federal money (Financial audit conducted but no A-133)</td>
<td>No systems are in place, or systems are new</td>
</tr>
<tr>
<td>Negotiated Indirect Cost Rate Agreement</td>
<td>Has detailed negotiated rate agreement</td>
<td>Has simple rate agreement</td>
<td>Does not have negotiated rate agreement</td>
</tr>
<tr>
<td>Audit Report</td>
<td>Has annual A-133 audit</td>
<td>Has annual third-party financial audit</td>
<td>Has not had an annual financial audit</td>
</tr>
<tr>
<td>Prior experience</td>
<td>Previous positive experience as Brown subrecipient</td>
<td>Previous experience as Brown sub, but may have some minor concerns</td>
<td>Collaborative agreements with potential for ITAR control needed</td>
</tr>
<tr>
<td>ITAR/EAR</td>
<td>No export controlled activity involved</td>
<td>No export controlled activity involved</td>
<td>Organization or project involves ITAR (e.g., satellites, biological warfare)</td>
</tr>
<tr>
<td>Compliance (Animal/Human Subjects, DNA, stem cells)</td>
<td>No compliance issues involved, or exempt per IRB</td>
<td>A/S or H/S involved, but non-medical or non-invasive</td>
<td>A/S, H/S, or other compliance issues involved, higher risk activities</td>
</tr>
<tr>
<td>Location of Work</td>
<td>At subrecipient's facility</td>
<td>Some work done at Brown facilities</td>
<td>On Brown campus</td>
</tr>
<tr>
<td>Brown Sponsor Type</td>
<td>Non-federal organizations or routine federal award programs (NSF, NIH)</td>
<td>More stringent federal programs (NASA, DOE, etc.)</td>
<td>Government-Owned/Contractor-Operated (e.g., national labs)</td>
</tr>
<tr>
<td>Relationship of Subrecipient PI</td>
<td>No relationship except collaborative/research-based</td>
<td>Brown PI's former post-doc</td>
<td>Conflict of Interest involved (e.g., family relations, PI is on Board or hold stock in organization)</td>
</tr>
<tr>
<td>Scope of Work &amp; Deliverables</td>
<td>Report only</td>
<td>Scope of work not clearly defined, collaborative work scope</td>
<td>Tangible products, deliverables necessary in order to achieve project success</td>
</tr>
<tr>
<td>Advantaged Status</td>
<td>No claimed status (small business, HUB zone, women/minority-owned, etc.)</td>
<td>One claim</td>
<td>Two or more claims</td>
</tr>
<tr>
<td>Special Considerations</td>
<td>Additional information which raises risk level, e.g. high funding level, risk category requiring a higher level of scrutiny</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**NB:** Risk Categories are analyzed on a sliding scale, so risk levels are based on the Contract & Sub-recipient Administrator’s evaluation. If s/he has concerns with the subrecipient, the Risk Analysis score can be bumped up to the next level.
Subrecipient Risk Analysis - High/Low Risk Entities

Subrecipient Name: ____________________________  Prime Sponsor: ____________________________  Subaward #: ____________________________  Date: ____________________________  Contract Administrator: ____________________________  Risk Level Assigned: ____________________________

Instructions: Assign a score (0, 1 or 2) for each Criteria listed below. Add up all of the Scores to calculate the Total Score.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Lower Risk</th>
<th>Higher Risk</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foreign or Domestic</td>
<td>Domestic</td>
<td>Foreign</td>
<td></td>
</tr>
<tr>
<td>Maturity of Subrecipient's Organization</td>
<td>Mature</td>
<td>Start-up</td>
<td></td>
</tr>
<tr>
<td>Organization Type</td>
<td>University or non-profit</td>
<td>Industry</td>
<td></td>
</tr>
<tr>
<td>Award type</td>
<td>Grant</td>
<td>Contract or Subcontract</td>
<td></td>
</tr>
<tr>
<td>Amount of Subgrant/Subcontract</td>
<td>Total cost is &lt;$499,999</td>
<td>Total cost is &gt;$500K</td>
<td></td>
</tr>
<tr>
<td>Percentage of Brown Award Subcontracted</td>
<td>Total cost is &lt;48.9%</td>
<td>Total cost is &gt;49%</td>
<td></td>
</tr>
<tr>
<td>Accounting Systems Established</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Procurement Systems</td>
<td>Approved</td>
<td>Not approved / ad hoc</td>
<td></td>
</tr>
<tr>
<td>Negotiated Indirect Cost Rate Agreement</td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Audit Report</td>
<td>A-133</td>
<td>No Audit Report</td>
<td></td>
</tr>
<tr>
<td>Prior experience working with Brown?</td>
<td>Previous positive experience</td>
<td>New Subrecipient, or previous negative experience</td>
<td></td>
</tr>
<tr>
<td>ITAR/EAR Type of work</td>
<td>No</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Compliance</td>
<td>No</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Location of Work</td>
<td>At subrecipient's facility</td>
<td>On Brown campus</td>
<td></td>
</tr>
<tr>
<td>Brown Sponsor Type</td>
<td>Private or Foundation</td>
<td>Government Owned &amp; Contractor Operated</td>
<td></td>
</tr>
<tr>
<td>Relationship of subrecipient to PI and potential for conflict of interest</td>
<td>No existing or former relationship to PI</td>
<td>PI's relative</td>
<td></td>
</tr>
<tr>
<td>SCW &amp; Deliverables</td>
<td>Report only</td>
<td>Tangible products; pivotal to success of project</td>
<td></td>
</tr>
<tr>
<td>&quot;Advantaged&quot; status claimed?</td>
<td>Not small business, HUB zone, etc.</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Special Considerations: up to an additional 8 points; e.g., high $</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Low = 0-40  Medium = 41-75  High = 76-99  Bumped to Next Level? _____ (Y or N)  Total Risk Score: _____

NOTES: ____________________________