



SUBRECIPIENT OR CONTRACTOR (VENDOR) DETERMINATION CHECKLIST

Per OMB Uniform Administrative Requirement 2 CFR §200.330, UH must determine whether a SUBRECIPIENT or CONTRACTOR (vendor) relationship exists with an entity. An analysis is required for any non-UH entity that performs on your project. When determining whether an entity is a subrecipient or a contractor it is critical to use your judgment in evaluating the substance of the relationship between UH and the entity. Please complete this worksheet to document your analysis.

Name of Entity (Payee): _____

Sponsor Name / Proposal or Project Title: _____

Based on the descriptions below, please choose the ONE that most closely characterizes your activity:

SUBRECIPIENT - The entity:

- Determines who is eligible to receive extramural assistance.
Has its performance measured in relation to whether objectives of the sponsor's program were met.
Has responsibility for programmatic decision making.
Is responsible for adhering to the sponsor's applicable program requirements specified in the award.
Uses extramural funds to carry out the specified public program, as opposed to providing goods or services for the benefit of the pass-through entity (UH).

OR

CONTRACTOR - The entity:

- Provides goods and services within normal business operations.
Provides similar goods or services to many different purchasers. Normally operates in a competitive environment.
Provides goods or services that are ancillary to the operations of the sponsor's program.
Is not subject to the sponsor's program compliance requirements as a result of a Services Agreement, though similar requirements may apply for other reasons.

Additional explanation for determination (if needed):

Empty rectangular box for additional explanation.

Prepared by: _____

PI Signature: _____