

SUBRECIPIENT COMMITMENT FORM INSTRUCTIONS

UNM HSC requires completion of the Subrecipient Commitment Form for all proposed subrecipients at the time of proposal submission to the prime sponsor.

Please download and complete this fillable PDF Form and attach all required documents directly to this PDF file. As you complete the form, note the following:



Do not complete this form on your browser. Download the file to your desktop before starting.



After you have attached documents to the PDF, you can view, delete or save them by clicking the paperclip icon on the left side navigation of the PDF;



Use the Save icon to save the PDF as a fillable file. Please do not “print to PDF” or scan a hard copy of the form; and

If you have any questions about completing the Subrecipient Commitment Form, contact the Sponsored Projects Office via email at HSC-PreAward@salud.unm.edu

SUBRECIPIENT COMMITMENT FORM

INSTITUTION		PROJECT	
Legal Name and Address (in SAM.gov)		Address where research will be performed Same as legal address	
Zip+4 Congressional District		Zip+4 Congressional District	
Subrecipient PI:		UNM HSC PI:	
Subrecipient Administrative POC:		Phone:	Email:
Unique Entity Identifier (UEI) #		DUNS#:	EIN#
FDP Member	Yes No	Proposed Project Dates:	
Type of Organization:		Total Subrecipient Costs:	
Prime Sponsor:			
Project Title:			

PROPOSAL COMPONENTS	
The following documents are included in our proposal submission and covered by the certifications below	
Required Components Scope of Work Detailed Budget Budget Justification	As Applicable Per Sponsor Requirements Key Personnel Biosketches Current & Pending Support _____ _____

A. TECHNICAL INFORMATION
1. SUBRECIPIENT CLASSIFICATION

The requirements and responsibilities of a UNM HSC Subrecipient are different from those of a vendor

Subrecipient	Vendor (Consultant, Contractor)
Responsible for significant programmatic decision-making Responsible for adherence to applicable sponsor compliance requirements Uses sponsor funds to carry out a Scope of Work Statement of Work may result in intellectual property or publishable rights	Provides goods and services within normal business operations Provides similar goods or services to other customers Provides goods or services that are ancillary to UNM HSC's sponsored project Is not subject to compliance requirements of Sponsor

 YES **NO** Our organization is properly categorized as a subrecipient based on our scope of work

2. COMPLIANCE
Our scope of work includes:

Human Subjects	Approval Date:	Pending
Human Stem Cells	Approval Date:	Pending
Animal Subjects	Approval Date:	Pending
Personally Identifiable Information (PII)		
Protected Health Information (PHI)		

YES **NO** If human subjects are involved, have all key personnel completed Human Subjects Training

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B. BUDGET INFORMATION

1. PROPOSED SUBRECIPIENT COSTS

Subrecipient Costs	Initial Budget Period	Entire Project Period
Direct Costs		
Indirect Costs (F&A)		
Total		

2. FACILITIES AND ADMINISTRATIVE RATES Select one:

We have applied our federally negotiated F&A Rates; our negotiated rate agreement is:

Attached Attach F&A Rate Agreement Available at:

We do not have a federally-negotiated Rate Agreement but have applied:

A negotiated rate with UNM HSC per the attached documentation Attach Negotiated F&A Rate Agreement

A 10% de minimis rate

We have applied other rates as required by the prime sponsor/policies/guidelines

2a. Federally Negotiated Indirect (F&A) Rate:

2b. Federally-Negotiated Indirect Rate Agreement Date:

3. FRINGE BENEFIT RATES Select One:

We have applied Rates consistent with or lower than our federally-negotiated rates. Our negotiated Rate agreement is:

Attached Attach Fringe Agreement Available at:

We do not have a federally-negotiated rate and have applied actual fringe benefits (specify the categories below)

We have applied other rates (Specify the basis on which rates have been calculated, including elements used below)

4. COST SHARING

YES

NO

Amount:

Cost sharing amounts and justification should be included in the subrecipient's budget

C. AUDIT COMPLIANCE

1. YES NO My Organization is a non-federal entity that is subject to the single audit requirement.
See URL: [§ 200.501 Uniform Guidance Audit Requirements](#)

If you answered "Yes": provide the following information:

Most Recent Audit report is available in the Federal Audit Clearinghouse on this URL:

Most Recent Audit report is available on this URL:

Our Audit report, with independent auditors' report for single audit for subject fiscal year has been completed. Material weakness, material instances of non-compliance, and/or findings were* were not noted.

If you answered "No": please indicate the reason/s the Single Audit requirement does not apply:

Our Organization expended less than \$750,000 in federal funds during our last fiscal year

Our Organization is a for-profit organization

Our Organization is a Non-University/SA

Other (include explanation in *Comments section below)

* If checked, explain in Comment Section below

Organizations not subject to the single audit requirement will be required to complete an Audit Certification and Financial Status Questionnaire.

SUBRECIPIENT COMMITMENT FORM

2. TURNOVER IN PROJECT PERSONNEL AND SUBSTANTIALLY CHANGED SYSTEMS RELATED TO THIS AWARD

By acknowledging the following and signing below, Subrecipient certifies that it will immediately notify Prime Awardee Institution in writing, if at any time during the duration of the Subaward relationship:

- 2a. Subrecipient has turnover in personnel related to this award
- 2b. Subrecipient implements any new or substantially changed systems related to this award

Subrecipient acknowledges and will comply

D. CERTIFICATIONS

1. CONFLICT OF INTEREST (COI) Select one:

Not applicable because the project is not being funded by PHS (NIH, CDC, AHRQ, etc.), or any other sponsor that has adopted the financial disclosure requirements (NSF, etc.).

Subrecipient Organization/Institution certifies that it has an active and enforced conflict of interest policy that is consistent with the provision of 42 CFR Part 50, Subpart F “Responsibility of Applicants for Promoting Objectivity in Research” and 45 CFR part 94 “Responsible Prospective Contractors.” Subrecipient also certifies that, to the best of Institution’s knowledge, (1) all financial disclosures will be made related to the activities that may be funded by or through a resulting agreement, and required by its conflict of interest policy, and (2) all identified conflicts of interest have or will have been satisfactorily manage, reduced or eliminated in accordance with subrecipient’s conflict of interest policy prior to the expenditures of any funds under any resultant agreement and within a timely manner sufficient to enable timely FCOI reporting.

Subrecipient does not have an active and/or enforced COI policy, but will have a PHS compliant policy in place and published at the time of award. (A sample policy can be found at <https://www.nationalacademies.org/about/institutional-policies-and-procedures/conflict-of-interest-policies-and-procedures>)

Subrecipient does not have an active and/or enforced COI policy and agrees to adopt UNM HSC’s policy and training located online at <http://hsc.unm.edu/research/coi/>.

By signing below, Subrecipient certifies that the required training will be completed by each investigator prior to engaging in any research related to any PHS funded contract/grant

2. DEBARMENT AND SUSPENSION Answer All:

Subrecipient, the PI or any other employee or student participating in this project are* are not debarred, suspended, proposed for debarment, declared ineligible, or otherwise excluded from or ineligible for participation in federal assistance programs, federal contracts, or activities.

Subrecipient, the PI or any other employee or student participating in this project are* are not presently indicted for, or otherwise criminally or civilly charged by a government entity.

Subrecipient has* has not within three (3) years preceding this offer, been convicted of or had a civil judgment rendered against them for commission of fraud or criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) contract or subcontract; violation of Federal or State antitrust statutes relating to the submission of offers; or commission of embezzlement, theft, forgery, bribery falsification or destruction of records, making false statements or receiving stolen property.

Subrecipient has* has not within three (3) years preceding this offer had any contract terminated for default by any federal agency

* If checked, explain in Comment Section below

3. NIH INTERNATIONAL SUBRECIPIENT REPORTING REQUIREMENTS (for Non-U.S. Subrecipients ONLY)

If the prime sponsor is the National Institutes of Health (NIH), Subrecipient is aware of the provisions of NIH GPS 15.2.1 requiring that international subrecipients provide access to the primary funding recipient (electronic access permissible), to copies of all lab notebooks, all data, and all documentation associated with the research as described in the progress report, and in alignment with progress report submission requirements, on no less than an annual basis.

If applicable, Subrecipient acknowledges and will comply

