



## Subrecipient Commitment Form

**INSTRUCTIONS:** Stetson University requires completion of this Subrecipient Commitment Form for all proposed subrecipients at the time of proposal submission to the prime funding agency. Providing complete and accurate information will expedite the proposal and issuance of the subaward agreement.

Email questions to: [grants@stetson.edu](mailto:grants@stetson.edu)

### Section 1: Pass Through Entity (PTE) Proposal Information

Stetson University Principal Investigator (PI)

PI Department

Prime Funding Agency

Federal Agency  
Non-Federal Agency

Proposal Title

### Section 2: Subrecipient Proposal Information

Subrecipient Institution Legal Name (must match UEI provided)

SAM.gov Unique Entity Identifier (UEI)

Employer Identification Number (EIN)

Congressional District

Address

City

State

Zip Code

Country

Performance Site

Same as above

Other address

### Section 3: Subrecipient Contact Information

Subrecipient Principal Investigator

Title

Phone

Email

Financial Contact (Institutional Level)

Title

Phone

Email

Authorized Organizational Representative

Title

Phone

Email

## Section 4: Subrecipient Budget Information

|                    |                      |                           |
|--------------------|----------------------|---------------------------|
| Performance Period | Start date           | End date                  |
| Direct Costs       | Indirect Costs (IDC) | Total Costs               |
| IDC Rate Type      | IDC Rate %           | IDC Base                  |
| Cost Share Amount  | Cost Share %         | Cost Share Not Applicable |

### Indirect Cost (IDC) Rates

Rates are consistent with our federally negotiated rates. See link below:

15% De minimis MTDC rate (permitted for institutions without a federally negotiated indirect cost rate agreement)

A reduced IDC rate dictated by the prime agency's published guidance

Indirect costs are not separately requested as costs are fully burdened. Provide documentation of approval (e.g. GSA rates or other published organizational document)

Other rates (include explanation or link, below)

### Fringe Benefit Rates

Rates are consistent with our federally negotiated rates. See link below:

Fringe Benefits are not separately requested as costs are fully burdened.

Other rates (include explanation or link below)

## Section 5: Subrecipient Requirements and Responsibilities

Before submitting a subrecipient proposal, the subrecipient must verify that it fits the characteristics of a subrecipient, rather than those of a contractor. The following chart outlines the differences.

Please check all that apply.

### Subrecipient:

Performance represents an intellectually significant portion of the overall programmatic effort and is measured against the objectives of the program

Use of funds is for a public purpose, as opposed to providing goods or services for the benefit of Stetson University

Responsible for adhering to applicable program requirements outlined in the terms and conditions negotiated upon receiving a notice of award

An identified principal investigator PI for the subrecipient who has responsibility for making programmatic decisions

### Contractor (Vendor):

Provides goods or services that are ancillary to the operation of the program identified in the prime award.

Provides the goods or services purchases with the funds within normal business operations

Provides similar goods or services to many different purchasers

Is not subject to the compliance requirements of the program as a result of the agreement with Stetson University

Normally operates in a competitive environment

***For the purpose of the proposal, my organization/institution is properly categorized as a subrecipient as described above. If no, please contact the Stetson University PI about procuring your products and services as a contractor (vendor).***

**Yes**

**No**

## Section 6: Subrecipient Proposal Document Checklist

The following documents are included in our subrecipient proposal submission and covered by the certifications below:

|                               |                   |  |
|-------------------------------|-------------------|--|
| Statement of Work             | Budget            | Budget Justification   |
| Resumes for all Key Personnel | Letter of Support | Official Rate documents (e.g. Negotiated Indirect Cost Rate Agreement) |

Other: \_\_\_\_\_

## Section 7: Subrecipient Proposal Compliance Information

Necessary compliance approvals including IRB and /or IACUC will be required before a subaward agreement can be issued. Please forward approvals to Stetson University Grants Office, [grants@stetson.edu](mailto:grants@stetson.edu)

|                      |    |                        |                                     |
|----------------------|----|------------------------|-------------------------------------|
| Human Subjects: Yes  | No | Approval Pending       | IRB Approval Date                   |
|                      |    | Exemption Date         | Federal-wide Assurance (FWA)#       |
| Animal Subjects: Yes | No | IACUC Approval Pending | IACUC Approval Date                 |
|                      |    | IACUC #                | PHS/OLAW Animal Welfare Assurance # |

Will any equipment, technology or information, subject to U.S. Export laws, be shared with a 'foreign person' or shipped/delivered to a foreign country? Yes No

Subrecipient certifies that all covered individuals have completed a research security training program consistent with Section 1634 of the CHIP and Science Act of 2022. (Dept of Energy Proposals only)

Yes No N/A

## Section 8: Conflict of Interest and Research Ethics

### 8A. Conflict of Interest (COI) Policy Certifications

N/A (The proposal is not being submitted to any of the agencies listed below)

1. The subrecipient organization/institution certifies that it has a COI policy consistent with the corresponding sponsoring agency and that it is active, enforced and publicly available online. Check all that apply:

PHS and other federal and non-federal entities that have adopted their FCOI policy.

DOE

NASA

NSF

List web links for corresponding subrecipient COI policies (required)

2. The subrecipient certifies that it currently **does not have** an active and /or enforced conflict of interest policy corresponding to the proposed sponsor, and subrecipient agrees to develop and implement an appropriate COI policy prior to award and provide the corresponding web link upon request to Stetson University.

### 8B. FCOI (Financial Conflict of Interest) Disclosure and Training certifications

As a non-federal entity the subrecipient certifies that it will disclose in writing any potential conflict of interest to the pass-through entity in accordance with applicable federal awarding agency policy. (2CFE 200.112).

Subrecipient certifies that in cases where an FCOI training requirement applies (PHS and DOE policies), it will be completed by each investigator prior to engaging in any research related to the awarded project.

#### 8C. Responsible Conduct in Research Training (NSF, USDA-NIFA, NIH)

N/A. The proposal is not being submitted to one of these agencies.

The subrecipient certifies that Responsible Conduct of Research (RCR)/Responsible and Ethical Conduct of Research (RECR) training will be completed by project personnel as defined in the corresponding sponsor's policy prior to the expenditure of funding.

#### 8D. Relation to Stetson University

The subrecipient's organization/institution contains immediate family members or employees who currently work at Stetson University.

## Section 9: Institutional Information

| Institution Type   | Experience Level in Managing Federal Funding                |
|--|---|
| Educational  | First time as a subrecipient organization/institution       |
| HBCU   | Less than 1 year experience                                 |
| Large Business   | 1-4 years' experience                                       |
| SBA – certified Small Business<br>or as defined in 14 CFR 124.1002 | 5-9 years' experience                                       |
| Governmental Organization  | 10+ years' experience                                       |
| Non-profit   |   |
| Non-U.S. based   |   |
| Active Registration in SAM.gov                                     | Member of Federal Demonstration Project Clearinghouse (FDP) |
| Yes                      No  | Yes                      No                                 |
| If yes, SAM.gov expiration date                                    | FDP Member information attached<br>FDP web link             |

**If subrecipient is a member or participant of FDP, sections 10-12 are not required**

## Section 10: Debarment or Suspension History

|   |   |
|---|---|
| Yes              No   | Is your Principal Investigator (or any other employee/student/affiliate planning to participate in this project) debarred, suspended or otherwise excluded from or ineligible for participation in federal assistance programs of activities?   |
| Yes              No   | Is your organization/institution presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from participation in any deferral department or agency or delinquent on repayment of any federal debt including direct and guaranteed loans and other debt as defined in 2 CFR Part 200? |
| Yes              No   | Is your organization/institution presently indicted, under investigation, or otherwise criminally charged by a government entity?   |
| Yes              No   | Has your organization/institution, within 3 years preceding this offer, had any contracts terminated for cause by any federal agency?   |
| For any 'Yes' answer above, please provide an explanation in the <b>Comments</b> section on the next page |   |

## Section 11: Audit and Financial Status

|                          |    |   |
|--------------------------|----|---|
| Yes                      | No | Was the subrecipient required to conduct an annual audit in accordance with the Single Audit Act or Uniform Guidance 2 CRF 200.501 for the most recent Audit year? <i>*Note: Foreign organizations that expend at least \$750,000 in U.S. federal funds over a fiscal year are no longer exempt from the Single Audit Act effective 10/01/24.</i>         |
| If Yes                   |    | We have attached a complete copy of subrecipient's most recent Single Audit report (including independent auditor's letters) OR<br>We have provided a link to a complete copy, here   |
| If No, indicate why not: |    | The organization/institution is a non-profit that expended less than \$1,000,000 in U.S. federal funds during our previous fiscal year<br>The organization/institution is a for-profit entity<br>The organization/institution is not a U.S. based entity <b>and</b> expended less than \$1,000,000 in U.S. federal funds during the previous fiscal year. |
| Fiscal Year              |    | Most recent fiscal year (FY) completed                      FY end date   |
| Yes                      | No | Does the subrecipient have annual financial statements reviewed or audited by an independent audit firm?  |
| If Yes                   |    | We have attached a complete copy of subrecipient's most recent financial report (including independent auditor's letters) OR<br>We have provided a web link to a complete copy  |
| If No, indicate why not: |    |   |
| Yes                      | No | Were any audit findings reported in the most recent Single Audit or annual financial report?  |

If 'Yes' answer above, please provide an explanation in the **Comments** section on the next page

## Section 12: Financial Responsibility

### The subrecipient certifies that

|     |    |  |
|-----|----|--|
| Yes | No | its financial system is in accordance with generally accepted accounting principles  |
| Yes | No | its financial system has the capability to identify, in its accounts, all federal awards received and expended, and the federal programs under which they were received            |
| Yes | No | it maintains internal controls to assure that it is managing federal awards in compliance with applicable laws, regulations and the provision of contracts, grants, and agreements |
| Yes | No | it and its financial system comply with applicable laws and regulations  |
| Yes | No | it can prepare appropriate financial statements, including the schedule of expenditures of federal awards  |
| Yes | No | it maintains an inventory  |

What procedures does the subrecipient use to identify and account for equipment purchased with federal grant funds? Attach a document or provide a web link

## Section 13: Approved for Subrecipient

The information, certifications and representations contained herein have been read, signed, and made by an authorized organizational representative of the subrecipient named herein. The appropriate programmatic and administrative personnel involved in this application are aware of "agency policy" regarding subrecipients and are prepared to enter into a subaward agreement consistent with those policies and the applicable flow-down requirements of the Prime Award, and to comply with all applicable federal laws and regulations. To the best of my

knowledge, the enclosed represents a true, complete, and accurate representation of work to be performed and costs to be incurred in the performance of the proposed project. If this proposal is in response to a federal opportunity, the requirements of the Federal Executive Order 140421 Covid-19 Workplace Safety Guidance may be applicable in a resultant subaward agreement. Those requirements would flow to any subrecipient involved in the project. Any terms of rates included in the proposal described herein are not binding upon the Pass-Through Entity. All terms and conditions between the parties will be outlined in a separate formal agreement.

|  |                  |
|--|------------------|
| <b>Subrecipient Authorized Organizational Representative</b> |                  |
| Full Name  | Signature / Date |
| Title  | Phone Number     |
| Email Address  |                  |

Comments