



SUBRECIPIENT COMMITMENT FORM

SECTION A – ORGANIZATIONAL INFORMATION

Legal Name of Subrecipient: _____

Parent Entity Legal Name (if applicable): _____

Address _____

Congressional District(s): _____

Unique Entity Identifier (UEI): _____

Federal Employer Identification Number (EIN): _____

SAM Registration Active (if federal funding involved): Yes No

Subrecipient Technical Lead: _____

Email: _____ Phone: _____

UCF Technical Lead: _____

Prime Sponsor: _____

Sponsor Type: Federal State Industry Foundation Other

Project Title: _____

Proposed Project Period: _____

Total Proposed Amount: \$ _____

Total Cost Sharing Amount (if applicable): \$ _____

SECTION B – FINANCIAL & RATE CERTIFICATIONS

Facilities & Administrative (F&A) Rate:

- Federally Negotiated Rate (attach agreement or provide URL)
- 15% de minimis MTDC (2 CFR 200.414(f))
- Sponsor-limited rate
- Other (explain)

Fringe Benefit Rates:

- Federally negotiated
- Institutionally established and consistently applied
- Other (explain)

Small Business Concern (13 CFR 121.105): Yes No

Government-Approved Property Control System (if equipment involved): Yes No

DDTC Registration (if export-controlled work involved): Yes No

Subrecipient certifies that proposed rates comply with applicable sponsor and regulatory requirements.

SECTION C – RESPONSIBILITY & INTEGRITY CERTIFICATION

- Subrecipient certifies that neither the organization nor its principals:
 - Are debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from federal assistance programs.
 - Are delinquent on federal debt.
 - Are presently indicted or criminally/civilly charged by a governmental entity.
 - Have, within the preceding three (3) years, been convicted of fraud or related offenses.
 - Have had contracts terminated for default by a federal agency within the preceding three (3) years.

 - Subrecipient certifies compliance with 2 CFR Part 200, 2 CFR Part 180, the Drug-Free Workplace Act, and 31 U.S.C. §1352, if applicable.

 - Not applicable (non-federal funding)
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SECTION D – RESEARCH INTEGRITY CERTIFICATIONS

Conflict of Interest

Subrecipient maintains its own active and enforced Conflict of Interest (COI) policy consistent with applicable sponsor requirements. If federal funding is involved and sponsor-specific regulations apply (e.g., 42 CFR Part 50 Subpart F or 45 CFR Part 94), Subrecipient certifies compliance with those requirements.

Subrecipient certifies that required disclosures have been obtained and that identified conflicts will be managed prior to expenditure of funds.

Subrecipient does not have an active or enforced conflict of interest policy and hereby agrees to comply with the University of Central Florida’s policies and procedures (available at <http://www.coi.ucf.edu>) relating to financial conflicts of interest. In accordance with this commitment, each Investigator(s), defined as persons responsible for the design, conduct, or reporting of this work, will submit a Subrecipient Disclosure Form prior to the expenditure of funds and complete CITI conflict of interest training within 30 calendar days of agreement execution.

Not applicable

Research Misconduct

(If sponsor is a Public Health Service (PHS) agency)

Subrecipient certifies that it maintains an active Research Misconduct Assurance of Compliance on file with the HHS Office of Research Integrity (ORI), as required under 42 CFR Part 93, or agrees to obtain such assurance prior to issuance of a subaward.

Provide the RM Assurance Number: _____

If No, please complete the [DHHS PHS Assurance of Compliance by Sub-Award Recipients Form](#) and submit to the ORI address indicated at the bottom of the form. A RM Assurance Number is required to receive PHS funding. Assurance program inquiries should be sent directly to ORI AskORI@hhs.gov.

SECTION E – RESEARCH SECURITY CERTIFICATION

Pursuant to the CHIPS and Science Act of 2022, NSPM-33, and applicable federal implementation guidance, the Subrecipient certifies that:

- All covered individuals participating in this project have completed compliant Research Security Training within the timeframe required by the prime sponsor.
 - Training addresses cybersecurity, international collaboration, foreign interference, disclosure requirements, conflicts of commitment, conflicts of interest, and proper use of federal research funds.
 - Completion of the [NSF-funded SECURE Center condensed module](#) is recognized as compliant; if alternative training is used, it is substantially equivalent and documentation will be maintained.
 - No covered individual is participating in a Malign Foreign Talent Recruitment Program as defined under Section 10631 of the CHIPS and Science Act of 2022.
 - Not applicable
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SECTION F – FOREIGN ORGANIZATION REQUIREMENTS

- Subrecipient agrees to comply with:
 - Foreign Talent Recruitment Program requirements under Public Law 117-167;
 - Sponsor-specific foreign data access requirements;
 - Disclosure requirements related to foreign components, affiliations, and other support.
 - Not applicable
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SECTION G – AUDIT STATUS

Subrecipient expended \$1,000,000 or more in federal funds in its most recent fiscal year:

- Yes (attach Single Audit or provide URL)
No (complete Audit Certification and Financial Status Questionnaire)

Subrecipient acknowledges UCF's obligation under 2 CFR 200.332 to conduct subrecipient monitoring and risk assessment.

SECTION H – REGULATORY APPROVALS

Human Subjects Involved: Yes No

IRB Approval Date: _____

FWA Number (if applicable): _____

Animal Subjects Involved: Yes No

IACUC Approval Date:

SECTION I – ADDITIONAL COMMENTS

SECTION J – DOCUMENTS INCLUDED WITH THIS SUBMISSION

The following documents are attached to this Commitment Form and incorporated by reference into the certifications herein (check as applicable):

Statement of Work

Detailed Budget and Budget Justification

Cost Share Documentation (if applicable)

Most Recent Single Audit Report (if required under 2 CFR 200 Subpart F)

Audit Certification and Financial Status Questionnaire (if audit is not required)

F&A Rate Agreement (if applicable)

Other:

The Subrecipient certifies that all attached documents are accurate and complete.

SECTION K – AUTHORIZED OFFICIAL CERTIFICATION

The Subrecipient understands and agrees that:

(a) Any work performed or expenses incurred prior to the full execution of a subaward agreement are undertaken at the Subrecipient's own risk.

(b) No work involving human subjects or vertebrate animals may begin until required regulatory approvals are obtained and a fully executed subaward agreement is in place.

The undersigned Authorized Official certifies that all information, representations, and certifications contained in this form are true, accurate, complete, and current; that institutional review and approval have occurred; and that the Subrecipient agrees to

comply with all applicable sponsor requirements and resulting subaward terms and conditions.

Authorized Official Name: _____

Title: _____

Signature: _____

Date: _____

Phone: _____

Email: _____

Email contact if subaward agreement is issued: _____

SUBRECIPIENT COMMITMENT FORM GUIDANCE

SECTION A - ORGANIZATION INFORMATION

- Effective April 4, 2022, all organizations receiving Federal financial awards (grants, cooperative agreements, contracts) or subawards are required to have a **Unique Entity Identifier (UEI)** created in SAM.gov. This requirement applies to both foreign and domestic organizations. UCF cannot issue a federally funded subaward until the entity has obtained a UEI.
SAM.gov: <https://sam.gov>
- If the Subrecipient is owned or controlled by a **parent entity**, provide that information on the Subrecipient Commitment Form for institutional risk review.
- Active **System for Award Management (SAM)** registration is required to receive Federal funding. SAM registration includes Representations & Certifications and exclusion records under the Excluded Parties List System (EPLS).
SAM.gov: <https://sam.gov>
- **Cost Sharing**
Per 2 CFR §200.306, cost sharing is required only when specified by sponsor policy or solicitation.
eCFR: <https://www.ecfr.gov/current/title-2/part-200/section-200.306>
Once proposed and awarded, cost sharing becomes a binding commitment.

SECTION B – FINANCIAL & RATE CERTIFICATIONS

- Per 2 CFR §200.414, if a Subrecipient has a federally negotiated indirect cost rate, that rate must be used.
eCFR: <https://www.ecfr.gov/current/title-2/part-200/section-200.414>
- If the Subrecipient does not have a negotiated rate, per 2 CFR §200.414(f) a **de minimis rate of 15%** of modified total direct costs (MTDC) may be included.
UCF will not negotiate an indirect cost rate with a Subrecipient.
- **Fringe Benefit rates** must be reasonable, consistently applied, and compliant with 2 CFR §200.431.
eCFR: <https://www.ecfr.gov/current/title-2/part-200/section-200.431>

- **Small Business Concern (SBC)** status is defined in 13 CFR §121.105.
eCFR: <https://www.ecfr.gov/current/title-13/part-121/section-121.105>
 - 2 CFR §200.302 and FAR 52.245-1 require entities to control and safeguard **Government property**.
eCFR: <https://www.ecfr.gov/current/title-2/part-200/section-200.302>
 - Under 22 CFR Parts 120–130, organizations performing **ITAR-controlled work** must be registered with the Directorate of Defense Trade Controls (DDTC).
eCFR: <https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M>
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SECTION C - RESPONSIBILITY & INTEGRITY CERTIFICATION

Debarment and Suspension

Executive Orders 12549 and 12689 and 2 CFR Part 180 prohibit participation of debarred or suspended entities in Federal programs.

eCFR: <https://www.ecfr.gov/current/title-2/part-180>

Organizations or individuals that are debarred, suspended, or proposed for debarment are not eligible to receive Federal funds.

SECTION D – RESEARCH INTEGRITY CERTIFICATIONS

- **Conflict of Interest (COI)**

Standards promoting objectivity in research are governed by:

42 CFR Part 50, Subpart F

<https://www.ecfr.gov/current/title-42/part-50/subpart-F>

45 CFR Part 94

<https://www.ecfr.gov/current/title-45/part-94>

Subrecipients proposing to Public Health Service (PHS) agencies, or agencies adopting PHS FCOI rules, must maintain a compliant policy or agree to follow UCF's policy.

UCF will not issue a subaward to an entity that does not maintain a sponsor-required policy or agree to comply with UCF's policy.

- **Research Misconduct (PHS-Supported Research Only)**

Institutions receiving U.S. Public Health Service (PHS) research funding must maintain a Research Misconduct Assurance under:

42 CFR Part 93

<https://www.ecfr.gov/current/title-42/part-93>

ORI Website:

<https://ori.hhs.gov>

UCF cannot issue a PHS-funded subaward unless the Subrecipient maintains an active RM Assurance Number.

SECTION E – RESEARCH SECURITY CERTIFICATION (Federal Research Awards Only)

Subrecipients participating in federally funded research must comply with:

- **CHIPS and Science Act of 2022 (Public Law 117-167)**
<https://www.congress.gov/117/plaws/publ167/PLAW-117publ167.pdf>
- **National Security Presidential Memorandum-33 (NSPM-33)**
<https://trumpwhitehouse.archives.gov/presidential-actions/presidential-memorandum-united-states-government-supported-research-development-national-security-policy/>
- NSF Research Security Implementation Guidance
<https://new.nsf.gov/research-security>

Covered individuals must complete Research Security Training addressing:

- Cybersecurity
- International collaboration
- Foreign interference
- Disclosure requirements
- Conflicts of commitment
- Conflicts of interest
- Proper use of Federal funds

Subrecipients must certify that no covered individual is participating in a **Malign Foreign Talent Recruitment Program**, as defined under Section 10631 of Public Law 117-167.

SECTION G – AUDIT STATUS

Under 2 CFR §200.512, UCF must obtain audit information and perform annual risk assessments on Subrecipients.

eCFR: <https://www.ecfr.gov/current/title-2/part-200/section-200.512>

The audit threshold is **\$1,000,000** in Federal expenditures during the Subrecipient's fiscal year.

Subrecipients that do not meet the threshold must complete the Audit Certification and Financial Status Questionnaire.

SECTION H – REGULATORY APPROVALS

- **Human Subjects**

Human subjects research must comply with 45 CFR Part 46.

eCFR: <https://www.ecfr.gov/current/title-45/part-46>

IRB approval must be provided to UCF prior to subaward issuance.

NIH human subjects training requirements (if applicable):

<https://grants.nih.gov/policy-and-compliance/policy-topics/human-subjects>

- **Federal Wide Assurance (FWA)**

Institutions engaged in human subjects research must maintain an FWA with the Office for Human Research Protections (OHRP).

<https://www.hhs.gov/ohrp>

- **Animal Subjects**

Animal research must comply with the Animal Welfare Act (7 U.S.C. §2131–2159).

[7 USC 2131: Congressional statement of policy](#)

IACUC approval must be provided prior to subaward issuance.

SECTION I – ADDITIONAL COMMENTS

If any response on the Subrecipient Commitment Form requires further explanation, include the explanation in this section.

SECTION K – AUTHORIZED OFFICIAL CERTIFICATION

The form must be signed by an Authorized Official of the Subrecipient organization.

By signing, the Authorized Official certifies that:

- All information is true, accurate, complete, and current;
- Institutional review and approval have occurred;
- The Subrecipient agrees to comply with all applicable sponsor and regulatory requirements.