



## SUBRECIPIENT COMMITMENT FORM

Subrecipients must complete this form in its entirety when submitting a proposal to UCF.

This form is required for all Subrecipients that are not registered in the [FDP Expanded Clearinghouse](#).

### SECTION A: Organization Information

Legal Name of Subrecipient's Organization/Institution		Name: Subrecipient Technical Lead	Email: Subrecipient Technical Lead
Address		City, State, Zip	
Federal Employer Identification Number (EIN)	Unique Entity ID	Congressional District/s	
Subrecipient Parent Entity Legal Name (if applicable)		Subrecipient Parent Entity Address	
Parent Entity Congressional District	Parent Entity Unique Entity ID	Parent Entity Employer Identification Number (EIN)	
UCF's Prime Sponsor	UCF's Technical Lead	Proposed Project Period	
Total Proposed Amount for Complete Project Period		Cost Sharing Amount for Complete Project Period	
Project Title			

### SECTION B: Certifications

1. Is Subrecipient registered in the [System for Award Management](#) (SAM) (formerly the Central Contractor Registration)?

Yes ☐ No ☐

2. **Facilities and Administrative Rates**

Does your organization has a Federally Negotiated F&A Rate? Yes ☐ NO ☐

Facilities and Administrative Rates included in this proposal have been calculated based on:

☐ Federally-negotiated F&A rates for this type of work  
(If this box is checked, please attach a copy of your F&A rate agreement or provide a URL link to the agreement.)

URL:

- ☐ Up to 15% de minimis MTDC rate based on 2 CFR 200.414(f) "Indirect F&A Costs"
- ☐ Rate limited to \_\_\_\_\_ percent ☐ MTDC or ☐ TDC in accordance with proposal solicitation
- ☐ Other rates (please specify the basis on which the rate has been calculated in **Section G** below).

3. **Fringe Benefit Rates** included in this proposal have been calculated based on:

Rates consistent with or lower than our federally-negotiated rates

(If this box is checked, please attach a copy of your Fringe Benefit rate agreement or provide a URL link to the agreement.)

URL:

Other rates (please specify the basis on which the rate has been calculated in **Section F** below and affirm the rates are consistently applied to all sponsored research proposals).

4. Is Subrecipient a **Small Business Concern** as defined in 13 CFR 121.105?

Yes ☐ No ☐

If YES, Subrecipient represents that it is a: Select One

5. Does Subrecipient have a Government-approved property control system?

Yes ☐ No ☐

6. Is Subrecipient registered with the Directorate of Defense Trade Controls (DDTC)?

Yes ☐ No ☐

7. Debarment and Suspension

Is the Subrecipient's Technical Lead, or any other employee or student participating in this project debarred, suspended or otherwise excluded from or ineligible for participation in Federal assistance programs or activities?

Yes ☐ No ☐

The Subrecipient certifies that it: *(answer all questions below)*

☐ is ☐ is not presently debarred, suspended, proposed for debarment, delinquent on, or declared ineligible for award of federal contracts.

☐ is ☐ is not presently indicted for, or otherwise criminally or civilly charged by a government entity.

☐ 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.

☐ has ☐ has not within three (3) years preceding this offer, had one or more contracts terminated for default by any federal agency.

**SECTION C: Conflict of Interest (COI)**

8. **Conflict of Interest Certification**

☐ Subrecipient certifies that it has an active and enforced conflict of interest policy that is consistent with the provisions of one of the following agencies:

**Public Health Service (PHS)** Yes ☐ No ☐

**National Science Foundation (NSF)** Yes ☐ No ☐

**Department of Energy (DOE)** Yes ☐ No ☐

**National Aeronautics and Space Administration (NASA)** Yes ☐ No ☐

Subrecipient further certifies that, to the best of its knowledge, all financial disclosures have been made related to the activities that may be funded by or through a resulting agreement, and required by its conflict of interest policy; and all identified conflicts of interest have or will have been satisfactorily managed, reduced, or eliminated in accordance with Subrecipient's conflict of interest policy prior to the expenditure of any funds under any resultant agreement.

☐ Subrecipient does not have an active or enforced conflict of interest policy and hereby agree(s) 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.

☐ No individuals have been identified as Investigators

☐ Names of individuals identified as Investigators are shown below:

Investigator Name
1.
2.
3.
4.

## SECTION D: Audit Status

### 9. Audit Status

Subrecipient expended \$1,000,000 or more in federal funds in Subrecipient's last fiscal year, and received a single or program-specific audit for that year in accordance with 2 CFR 200 Subpart F.

a. Most recent fiscal year (FY) completed: **FY:** \_\_\_\_\_  
(Please attach a copy of your most recent audit or provide a URL link to the document.)  
URL:

b. Were any Research audit findings reported? Yes ☐ No ☐

If **YES**, the audit finding(s) considered a: Select One

Subrecipient DOES NOT receive an annual audit in accordance with 2 CFR 200 Subpart F because Subrecipient is

If Subrecipient does **not** receive an annual audit in accordance with 2 CFR 200 Subpart F:

Please complete the [Audit Certification and Financial Status Questionnaire](#). A limited scope audit may be required.

## SECTION E: Project Information

10. Will **Human Subjects** be involved in this project? Yes ☐ No ☐

\_\_\_\_\_  
Determination of Exemption or IRB Approval Date

\_\_\_\_\_  
IRB Protocol Number

If **YES**, a copy of the determination of exemption or IRB approval must be provided to the UCF before a subaward may be issued. If not attached here, obtain approval as required and forward these documents to UCF's PI.

If **YES**, and proposal is to **NIH**, all key personnel engaged with human subjects must take NIH human subjects research training or other human subjects research training as required by NIH [http://grants.nih.gov/grants/policy/hs/hs\\_policies.htm](http://grants.nih.gov/grants/policy/hs/hs_policies.htm)

a) Have all key personnel involved in the project completed human subjects training? Yes ☐ No ☐

11. If human subjects are involved in this project, does your organization/institution have a Federal Wide Assurance Number? Yes ☐ No ☐

\_\_\_\_\_  
FWA Number

12. Will **Animals** be involved in this project? Yes ☐ No ☐

\_\_\_\_\_  
IACUC Approval Date

\_\_\_\_\_  
IACUC Protocol Number

If **YES**, a copy of the IACUC approval must be provided to the UCF before a subaward may be issued. If not attached here, obtain approval as required and forward these documents to UCF's PI.

13. Cost Sharing: ☐ Yes ☐ No Amount: \$

*Cost sharing amounts and justification should be included in Subrecipient's proposal.*

14 Will there be an exchange of confidential information (requiring a **Confidential Disclosure Agreement**) associated with this project? ☐ Yes ☐ No

15 Will there be an exchange of materials (requiring a **Material Transfer Agreement**) associated with this project? ☐ Yes ☐ No

#### SECTION F: Research Misconduct Assurance:

16 Is this project funded by PHS? ☐ Yes ☐ No

If YES, please select one of the responses below:

Does your organization/institution have a **Research Misconduct (RM) Assurance of Compliance** on file with the DHHS Office of Research Integrity (ORI)? ☐ Yes ☐ No

If YES, 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. Assurance program inquiries should be sent directly to ORI [AskORI@hhs.gov](mailto:AskORI@hhs.gov).

The following documents are attached to this **Subrecipient Commitment Form** and included in Subrecipient's proposal submission being submitted for UCF's consideration and are covered by the certifications below: *(check as applicable)*

☐ **STATEMENT OF WORK** (required at proposal)

☐ **BUDGET AND BUDGET JUSTIFICATION** (required at proposal)

☐ Most recent **FINANCIAL AUDIT** (required at proposal)

☐ Most recent **W-9** (required to issue subaward)

☐ **CERTIFICATE OF CURRENT COST OR PRICING DATA**

*(required for awards exceeding \$2 million and where price was not established by adequate price competition by catalog prices or by law. Nonprofit Subrecipients are exempt from this certification when the agreement type is cost-reimbursable no-fee)*

☐ Small/Small Disadvantaged Business **SUBCONTRACTING PLAN**, in agency-required format  
*(if Subrecipient is receiving \$750,000 or greater for research or \$1.5 million for construction to a second-tier party)*

☐ **OTHER:** \_\_\_\_\_

## SECTION G: Comments

### Subrecipient's Authorized Official Representative (AOR) Approval

The information, certifications and representations above have been read, signed and made by an authorized official of the Subrecipient named herein. The appropriate programmatic and administrative personnel involved in this application are aware of agency policy in regard to subawards and are prepared to establish the necessary inter-institutional agreements consistent with those policies.

The appropriate programmatic and administrative personnel of each institution involved in this grant application are aware of the PHS-NIH consortium grant policies and are prepared to establish the necessary inter-institutional agreements consistent with those policies. In signing below, the Cooperating Institution certifies it has implemented and is enforcing a written policy of conflicts of interest consistent with the provisions of 42 CFR Part 50, Subpart F & 45 CFR Subtitle A, Part 94. If a conflict is identified by the Cooperating Institution during the period of the award contemplated under this agreement, the Cooperating Institution will report to the Prime Awardee the existence of the conflict, including the grant title, PI (if different from the investigator with the financial interest) and the specific method the Subrecipient adopts for addressing the conflict (managing, reducing, or eliminating it). The Subrecipient will rely on the Prime Awardee to report the existence of the conflict to NIH.

If the Prime Awarding Sponsor is NIH and the Subrecipient is a Foreign organization as defined by the NIH Grants Policy Statement: the Subrecipient agrees to abide by the requirements of the NIH Final Updated Policy Guidance for Subaward/Consortium Written Agreement (NOT-OD-23-182), and will provide access to copies of all lab notebooks, all data, and all documentation that supports the research outcomes as described in the progress report, to the PTE with a frequency of no less than once per year, in alignment with the timing requirements for Research Performance Progress Report submission. Such access may be entirely electronic.

If the Prime Awarding Sponsor is a U.S. federal agency and the Subrecipient is a foreign organization, the Subrecipient certifies they are aware of the Foreign Talent Recruitment Program requirements of the CHIPS and Science Act of 2022 (Subtitle D Research Security, Sections 10631, 10632, and 10638 of the U.S. Public Law 117-167) and are willing to abide by all requirements should an award be issued.

I understand that (a) any work we begin and or/expenses we incur related to our proposal prior full execution of a subaward agreement will be at my organization own risk, and (b) no work involving human subjects and/or animals may begin until my organization has obtained registered Institutional Review Board and or Animal Care and Use Committee review and approval.

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Signature of Subrecipient's Authorized Official

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Date

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Name and Title of Authorized Official

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Authorized Official Phone

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Authorized Official Email

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Subrecipient Departmental Contact Name/Title

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Email for Awards (if different from above)

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Subrecipient Departmental Contact Email

## SUBRECIPIENT COMMITMENT FORM GUIDANCE

### SECTION A: Organization Information

- Effective April 4, 2022, all organizations receiving Federal financial awards (i.e., grants, cooperative agreements, contracts) or **subawards** are required to have a Unique Entity Identifier (UEI) created in SAM.gov. This includes both foreign and domestic organizations. **UCF will not issue a subaward to an entity until it applies for and receives a UEI.**
- If the subrecipient is owned or controlled by a parent entity, provide that information on the Subrecipient Commitment Form to do an overview risk analysis.

### SECTION B: Certifications

1. Active System for Award Management (SAM) registration is a prerequisite to submit grant applications and receive funding from the Federal Government. SAM includes an organization's registration to do business with the government, their Representations & Certifications, and any exclusion records from Excluded Parties List System (EPLS), active or expired. This includes both foreign and domestic organizations.
2. Per 2 CFR §200.331(4) if the subrecipient has a federally negotiated indirect cost rate, that rate must be used. If the subrecipient does not have a negotiated rate, per 2 CFR §200.414(f) a de minimis rate of 15 percent of modified total direct costs may be included in the budget. If a sponsor limits the allowable indirect cost rate by either written policy or by program solicitation, UCF will flow down the reduced rate to all subrecipients. **UCF will NOT negotiate an indirect cost rate with a subrecipient.**
3. Fringe Benefit rates should be confirmed by ORC as part of the budgeting process. Per 2 CFR §200.431 fringe benefits are allowable provided that the benefits are reasonable and are required by law, non-Federal entity employee agreement, or an established policy of the non-Federal entity. Any rates not federally negotiated should be reviewed for consistency.
4. Small Business Concerns (SBC) must be identified in the event special terms are required to be flowed down by the Federal entity. If a subrecipient is identified as a small business concern, the type should be identified. This also assists UCF with SBC reporting. See the U.S. Small Business Administration for clarification.
5. 2 CFR §200.302 and FAR 52.245-1 require an entity to "control, protect, preserve, and maintain all Government Property" in its possession or under its control. A government-approved property control system indicates an entity's compliance with OMB and FAR regulations, and is a factor for risk analysis if

subrecipient will be purchasing equipment. If an organization does not have a government-approved property control system and are purchasing or receiving Government Furnished Property/Equipment, the organization is automatically considered high risk.

6. According to 22 CFR Part 120-130, all manufacturers, exporters, and brokers of defense articles, related technical data and defense services on the International Traffic in Arms (ITAR) United States Munitions List (USML) are required to register with the Directorate of Defense Trade Controls (DDTC). **UCF cannot issue a subaward to an organization performing ITAR export-controlled work until the organization is registered with the DDTC.**
7. Executive Orders 12549 and 12689, 2 CFR part 180 state that suspension and debarment actions prevent companies and individuals from participating in government contract, subcontracts, loans, grants and other assistance programs. Any organization or individual that is presently debarred, suspended, or proposed for debarment is not eligible to receive Federal funds. Any person presently indicted or who has been convicted or, within the past three years, received a civil judgment against them for the reasons listed are not eligible to receive Federal funds. **UCF cannot include such individuals and organizations in any subaward or procurement action.**

If an organization or individual has had one or more contracts terminated for default by a Federal agency within the past three years, consult with your Assistant Director for further direction regarding the ability to issue a subaward.

## SECTION C: Conflict of Interest

8. 42 CFR part 50.604(a) put in place Financial Conflict of Interest (FCOI) policies to preserve the public's trust that research supported by PHS agencies, and those agencies following PHS FCOI rules, is conducted without bias and with the highest scientific and ethical standards. Any entity proposing to a PHS agency, or any agency adopting PHS FCOI rule, must have a PHS-compliant FCOI policy in place or agree to abide by UCF's policy. A subaward cannot be issued if the organization does not have a policy or will not follow UCF's policy.

Standards have been created to promote objectivity in research and to provide a reasonable expectation that the design, conduct, and reporting of research will be free from bias resulting from conflicts of interest. A subrecipient must certify the existence of an active and enforced conflict of interest policy consistent with 42 CFR Part 50, Subpart F.

While not all program or funding announcements contains specific statements as to the applicability of the FCOI regulations, agencies do list their award management guidelines and/or standalone COI policies on their website. Prior to submitting a proposal, UCF recommends checking for relevant FCOI

requirements on the federal funding agency's website. **UCF will NOT issue a subaward to an entity without sponsor mandated policy or that does not agree to follow UCF's policy.**

#### SECTION D: Audit Status

9. Per 2 CFR 200.512 UCF is required to obtain audits and perform annual risk assessments on subrecipients. UCF may utilize the [Federal Audit Clearinghouse](#) or the [FDP Expanded Clearinghouse](#) to obtain audit information. If the subrecipient audit is not available UCF will request audit reports directly from the subrecipient. The threshold is for any Federal expenditure, not just research.

A subrecipient that does not have an audit prepared in accordance with 2 CFR 200 Subpart F **must** complete the Audit Certification and Financial Status Questionnaire. Refer to this document's guidance instructions.

#### SECTION E: Project Information

10. A "human subject" can be a living individual who becomes a subject in research, an individual whose specimen is used in research, or an individual whose private and identifiable information is obtained. The subrecipient must submit to UCF their Institutional Review Board (IRB) approval prior to receiving a subaward from UCF. When human subject use does not occur at the beginning of the project, it is possible to issue a subaward with enough incremental funding to conduct the research until the animal use begins. Consult with your Assistant Director for guidance on issuing a subaward prior to IRB approval.
11. The Federalwide Assurance (FWA) is the only type of assurance currently accepted and approved by the Office for Human Research Protections (OHRP). Through the FWA, an institution commits to the U.S. Department of Health and Human Services (HHS) that it will comply with the requirements in the HHS Protection of Human Subjects regulations at 45 CFR part 46. If the subrecipient does not have an FWA, it will need to rely on either UCF's IRB or an independent IRB for approval.
12. Animal use includes both laboratory animals and wildlife animals. The subrecipient must submit to UCF an approval from their Institutional Animal Care and Use Committee (IACUC) prior to receiving a subaward from UCF. When animal use does not occur at the beginning of the project, it is possible to issue a subaward with enough incremental funding to conduct the research until the subject use begins. Consult with your Assistant Director for guidance on issuing a subaward prior to IACUC approval.
13. Per 2 CFR 200.306 cost share is not expected by Federal agencies unless specified in a notice of funding opportunity. Therefore, Subrecipient cost share should be provided only when required by a sponsor's written policy or program solicitation. Once the cost share is proposed in UCF's budget, it becomes committed cost share and must be tracked by financial compliance. If the subrecipient does not meet their cost share commitment, UCF will be responsible for providing the difference to the sponsor. Increased monitoring of the subrecipient may be necessary.



14. If a Confidential Disclosure Agreement is needed at the proposal stage, contact the [UCF Contract Office](#) for assistance.
15. Institutions with U.S. Public Health Service (PHS) supported biomedical or behavioral research, research training or activities related to that research or research training must provide PHS with an assurance of compliance with the Public Health Service Policies on Research Misconduct, 42 C.F.R. Part 93. **UCF will not issue a subaward under a PHS sponsor if the organization does not have a RM Assurance Number.**

#### SECTION F: Comments

- If answers to any section of the Subrecipient Commitment Form require a more detailed explanation, be sure the explanation is included in this section.

#### Signature Block

- This form should be completed and signed by an Authorized Representative of the Subrecipient.