**SUBRECIPIENT COMMITMENT FORM**

Subrecipient Legal Name:

Subrecipient Pl Name:

Proposal Title:

Performance Period: Start Date       End Date

Sponsor:

## SECTION A - Proposal Documents

The following documents are included in our proposal submission and covered by the certifications below (check as applicable):

Statement of Work (**required**)

Budget and Budget Justification (**required**)

Biosketches of all Key Personnel, in agency-required format

Other:

Other:

## SECTION B - Certifications

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

Our federally-negotiated F&A rates for this type of work, or a reduced F&A rate that we hereby agree to accept. (Please provide a copy of the agreement)

Other rates (please specify the basis on which the rate has been calculated in Section E *Comments* below)

**2. 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 FB rate agreement or provide a URL link to the agreement.)*

Other rates (please specify the basis on which the rate has been calculated in Section E *Comments* below).

## 3. Human Subjects Yes No Approval Date:

***If "Yes":*** *Copies of the IRB approval and approved "Informed Consent" form must be provided before any subaward will be issued. Please forward these documents to Wellesley College’s Sponsored Research Office as soon as they become available.*

## *If "Yes"*: Have all key personnel involved completed Human Subjects Training? Yes No

1. **Animal Subjects**  **Yes**  **No Approval Date:**

***If "Yes":*** *A copy of the IACUC approval must be provided before any subaward will be issued. Please forward this document to Wellesley College’s Sponsored Research Office as soon as it becomes available.*

1. **Conflict of Interest (applicable to PHS and other sponsors that have adopted the federal financial disclosure requirements)**

Not applicable because this project is not being funded by NIH, NSF, or other sponsor that has adopted the federal financial disclosure requirements.

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.” Subrecipient also certifies that, to the best of Institution’s knowledge, (1) all financial disclosures have been made related to the activities that may be funded by or though a resulting agreement, and required by its conflict of interest policy; (2) 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 expenditures of any funds under any resultant agreement and; (3) if an FCOI related to the work on Prime’s award is identified, the subrecipient will notify the Wellesley College Sponsored Research Office within 30 days of subrecipient PI’s disclosure.

Subrecipient does not have an active and/or enforced conflict of interest policy but will adopt the COI FDP Model Policy found at: <http://thefdp.org/default/committees/research-compliance/conflict-of-interest/>

## Debarment and Suspension (answer all questions below, and explain as needed in Section E Comments below):

Is the PI 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**

(**if “Yes”,** explain in Section E *Comments* below)

**The Subrecipient certifies that they:**

|  |  |  |
| --- | --- | --- |
| are | are not | presently debarred, suspended, proposed for debarment, or declared ineligible for award of federal contracts. |
| are | are not | presently indicted for, or otherwise criminally or civilly charged by, a government entity. |
| have | have not | within three 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 of 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. |
| ` have | have not | within three years preceding this offer, had one or more contracts terminated for default by any federal agency. |

## SECTION C - Audit Status

1. **Audit Status**

Subrecipient receives an annual audit in accordance with OMB Uniform Guidance (formerly OMB Circular A-133).

Most recent fiscal year completed: FY

Were any audit findings reported? (If "Yes," explain in Section E, *Comments*, below.)  **Yes**  **No**

**Please attach a complete copy of your most recent OMB Uniform Guidance audit report or provide the URL link to a complete copy.**

Subrecipient DOES NOT receive an annual audit in accordance with OMB Uniform Guidance.

Subrecipient is a:  Non-profit entity (under federal funding threshold)

Foreign entity

For profit entity

Government entity

## SECTION D – Subrecipient Requirements and Responsibilities

Wellesley College views a subrecipient organization as a true partner in carrying out a sponsored project. The requirements and responsibilities of a subrecipient are different from that of a vendor/supplier/consultant. The following chart outlines the differences:

|  |  |
| --- | --- |
| **Subrecipients** | **Suppliers/Vendors/Consultants** |
| (a) Subrecipient’s PI (named on page 1) will take a significant role in programmatic decision making and assist the Wellesley College PI in achieving the project’s goals and objectives.  (b) Subrecipient will be subject to all of the compliance requirements from the prime award that are pertinent to the subrecipient, e.g., effort reporting on federal awards.  (c) Subrecipient will be expected to provide a complete copy of the subrecipient’s most recent OMB Uniform Guidance (formerly OMB Circular A-133) audit report, or the URL link to a complete copy, before a subagreement can be established. | (a) Provides routine goods and/or services to other customers or clients and/or  (b) Provides goods or services developed according to the specifications of the Wellesley College PI and/or  (c) Provides other ancillary services related to the sponsored project per the instructions of the Wellesley College PI and/or  (d) Provides personnel services that are primarily advisory in nature. |

My organization is properly categorized as a subrecipient as described above and agrees to the project roles, compliance responsibilities, and audit requirements listed above.

Yes  No

## SECTION E - Comments

|  |  |
| --- | --- |
| **APPROVED FOR SUBRECIPIENT**  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. **Any work begun and/or expenses incurred prior to execution of a subaward agreement are at the Subrecipient’s own risk.** | |
| \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Signature of Subrecipient’s Authorized Official  Name and Title of Authorized Official:    Email:  Phone:  Date: | Legal Name of Subrecipient’s Organization/Institution:  Address:  Subrecipient’s Congressional District:  Federal Employer Identification Number (EIN):  SAM Registered:  Yes  No  UEI number:  DUNS or DUNS+4 number:       No |