FEDERAL SUBRECIPIENT OR CONTRACTOR (VENDOR) DETERMINATION CHECKLIST

Per OMB Uniform Administrative Requirement 2 CFR §200.330, UH must determine whether a SUBRECIPIENT or CONTRACTOR (vendor) relationship exists with an entity you have identified in an agreement. This is mandatory if the payment will be coded with object codes 7100/7150/7172. When determining whether an entity is a subrecipient or a contractor it is critical to use your judgment in evaluating the substance of the relationship between UH and the entity. Please complete this worksheet and attach to the purchase order.

Name of Entity (Payee): _____________________________________________ Date: __________________

Name of Sponsor: _________________________________________________________________________

Based on the descriptions below, please choose the **ONE** that most closely characterizes your activity:

- **SUBRECIPIENT** – The entity:
  - Determines who is eligible to receive Federal assistance.
  - Has its performance measured in relation to whether objectives of the Federal program were met.
  - Has responsibility for programmatic decision making.
  - Is responsible for adhering to applicable Federal program requirements specified in the award.
  - Uses the Federal funds to carry out the specified public program, as opposed to providing goods or services for the benefit of the pass-through entity (UH).

- **CONTRACTOR** – The entity:
  - Provides goods and services within normal business operations.
  - Provides similar goods or services to many different purchasers.
  - Normally operates in a competitive environment.
  - Provides goods or services that are ancillary to the operations of the Federal program.
  - Is not subject to Federal program compliance requirements as a result of the agreement, though similar requirements may apply for other reasons.

Additional explanation for determination (if needed):

Prepared by:

Signature/Print Name/Title