

SUBRECIPIENT AND VENDOR DETERMINATION CHECKLIST

2 CFR § 200.330

Contract Number	Prepared By	CFDA Number	Date

Subrecipient and Vendor Determination

(a) General: An auditee may be a recipient, a subrecipient, and a vendor. Federal awards expended as a recipient or a subrecipient would be subject to audit under this part. The payments received for goods or service provided as a vendor would not be considered Federal awards. The guidance in paragraphs (b) and (c) of this section should be considered in determining whether payments constitute a Federal award to a subrecipient or a vendor contract for payment of goods and services.

SUBRECIPIENT (check YES or NO for each statement)

(b) Federal Award: Characteristics indicative of Federal award received by a subrecipient are when the organization:

1. Determines who is eligible to receive what Federal financial assistance? Yes No
2. Has its performance measured against whether the objectives of the Federal program are met? Yes No
3. Has responsibility for programmatic decision-making? Yes No
4. Has responsibility for adherence to applicable Federal program compliance requirements? Yes No
5. Uses the Federal funds to carry out a program of the organization as compared to providing goods or services for a program of the pass-through entity? Yes No

VENDOR (check YES or No for each statement)

(c) Payment for goods and services:

1. Provides the goods and services within a normal business operation? Yes No
2. Provides similar goods and services within normal business operation? Yes No
3. Operates in a competitive environment? Yes No
4. Provides goods and services that are ancillary to the operation of the Federal program? Yes No
5. Is not subject to compliance requirements of the Federal program? Yes No

(d) Use of judgment in making determination. There may be unusual circumstances or exceptions to the listed characteristics. In making the determination of whether a subrecipient exists, the substance of the relationship is more important than the form of the agreement. It is not expected that all of the characteristics will be present and judgment should be used in determining whether an entity is a subrecipient or vendor. Judgment notes:

Determination (check one)

<input type="radio"/> Subrecipient ¹ <input type="radio"/> Vendor	Organization Name <input style="width: 100%;" type="text"/>	DUNS <input style="width: 100%;" type="text"/>	CageCode <input style="width: 100%;" type="text"/>
<input style="width: 100%;" type="text"/> Contract Number	<input style="width: 100%;" type="text"/> Contract Manager Name	<input style="width: 100%;" type="text"/> Contract Manager Signature	
<input style="width: 100%;" type="text"/> Date of Signature	Yes No	Organization has not been suspended or debarred per verification in https://www.sam.gov/portal/public/SAM/ as attached.	

¹If the county enters into an agreement with a sub-recipient for greater than or equal to \$25,000 and the original grant award was a direct award from a federal granting agency, the sub-recipient agency must complete the County's FFATA reporting form and the Department in charge of the grant must return to the Senior Budget Analyst within 15 days of subaward to ensure timely reporting.