

If a subrecipient will be named in a prime proposal, this form must be completed and signed by the UA Principal Investigator and submitted to SPCS as a proposal attachment when the prime sponsor proposal is submitted through UAR. This ensures that the prime award will be properly structured and there will be no barriers to flowing funds to subrecipients. This form must also be submitted to Subaward Services with the subaward initiation documentation. This certification and the supporting documentation you retain will be required in the event of a federal audit.



ORC - Subawards

Subrecipient Qualification Form

UA Financials Account #	UA PI:
Subrecipient:	Subrecipient PI:

A. Subrecipient vs. Vendor Determination

1. Please assess the characteristics of the role of the contributing entity, checking only those boxes that apply. Boxes in both columns may be checked.

<u>Subrecipient</u>	<u>Vendor (Contractor)</u>
<input type="checkbox"/> The subrecipient's statement of work represents an intellectually, scholarly significant portion of the programmatic effort to the overall project <input type="checkbox"/> The contribution of the subrecipient is uniquely designed in response to each project <input type="checkbox"/> The subrecipient technical lead is a scientific collaborator, or even a co-investigator on the UA project <input type="checkbox"/> The subrecipient participates in the development of the overall project statement of work <input type="checkbox"/> The subrecipient's results are likely to be published in the scientific literature independently, and/or the subrecipient is likely to be a co-author on a UA publication	<input type="checkbox"/> Vendor provides the goods or services within normal business operation and to many different purchasers <input type="checkbox"/> Vendor competes against other entities providing the same or similar goods or services <input type="checkbox"/> Vendor performs a series of repetitive tests or activities requiring little or no discretionary judgement <input type="checkbox"/> Vendor technical lead makes contributions that do not result in qualifying as a co-author on UA publications, or that do not warrant independent publication in scholarly journals <input type="checkbox"/> Vendor submits a bid in response to UA's definition of the scope of work to be performed

2. Based upon the above analysis, the contributing entity is judged to be a

B. Sole Source Justification

1. Please choose of one of the two options below:

- Subrecipient's proposal is included in UA's proposal package to the prime sponsor and is evaluated by the prime sponsor along with UA as part of the overall selection process conducted pursuant to the sponsor's guidelines. Sponsor's award of this proposal indicates that the technical aspects of the subrecipient's proposal are acceptable, and therefore, this subrecipient is the logical and justifiable choice for this subaward. Please skip the remaining questions in Section B and proceed to Section C.
- The subrecipient's proposal is not included in UA's proposal package to the prime sponsor.

2. Were competitive bids sought?

- Yes – Please retain in your file the documentation that evidences the competitive bid process, including justification for why the other sources could not be used, for a period of seven years, if we receive the prime award and proceed with this subaward. You may be required to produce this data in the event of an audit. Please skip the remaining questions in Section B and proceed to Section C.
- No

3. Provide specific justification for selecting the subrecipient on a sole source basis by answering the following questions.

- a. Based on what expertise or resource was this particular subrecipient selected to perform this work?

- b. Why is this particular subrecipient's expertise or resource critical to the project?

C. Cost/Price Analysis

All costs proposed by the subrecipient under this subaward were reviewed and approved by the UA Principal Investigator as reasonable and necessary for the proposed scoped of work. Items reviewed include:

- Salaries and level of effort have been reviewed and appear to be reasonable for the proposed scope of work
- Specific equipment, fabricated equipment, and/or supplies are separately listed and are appropriately based on standard or catalog prices, or vendor quotes
- Travel, if any, appears to be necessary, and trips are priced separately and correctly, based on both technical review and review of published air fares, hotel rates and per diem rates.
- Indirect cost rates and fringe benefits were based on either the current negotiated rate with the federal government, a 10% de minimus indirect cost rate (8% for foreign recipients with an NIH prime), if allowed, or 0%.

Yes

No – Please explain:

Please retain supporting documentation for the above certifications in departmental files for seven years if we receive the prime award and proceed with this subaward. You may be required to produce this documentation in the event of an audit.

D. UA Conflict of Interest

Do you or a relative (spouse, partner, child (including step), parent, grandparent, in-laws, siblings and their in-laws), or any UA staff involved in this project or their relatives have a personal or financial interest in the proposed subrecipient organization?

E. Risk Assessment

Has the UA PI or department had recent or relevant experience with this organization as a subrecipient?

F. Subaward Details

1. Data Sharing (DMP). If the prime award is federal or sub-federal, does it include a requirement that a data management/sharing plan be established with the subrecipient?

2. Human Subjects. *Please note: Human Subjects and Human Subjects Data can appear in agreements independently of each other.*

- a. Will the subrecipient be conducting human subjects research under this subaward?

- b. Will human subjects data be exchanged with the subrecipient?

3. Vertebrate Animals.

Will the subrecipient's research involve work with vertebrate animals?

G. Principal Investigator Certification

I certify that the information and responses I have provided above are, to the best of my knowledge, an accurate assessment of the subrecipient's qualifications, and an accurate representation of the processes used to select the subrecipient and of my relationship to the subrecipient.

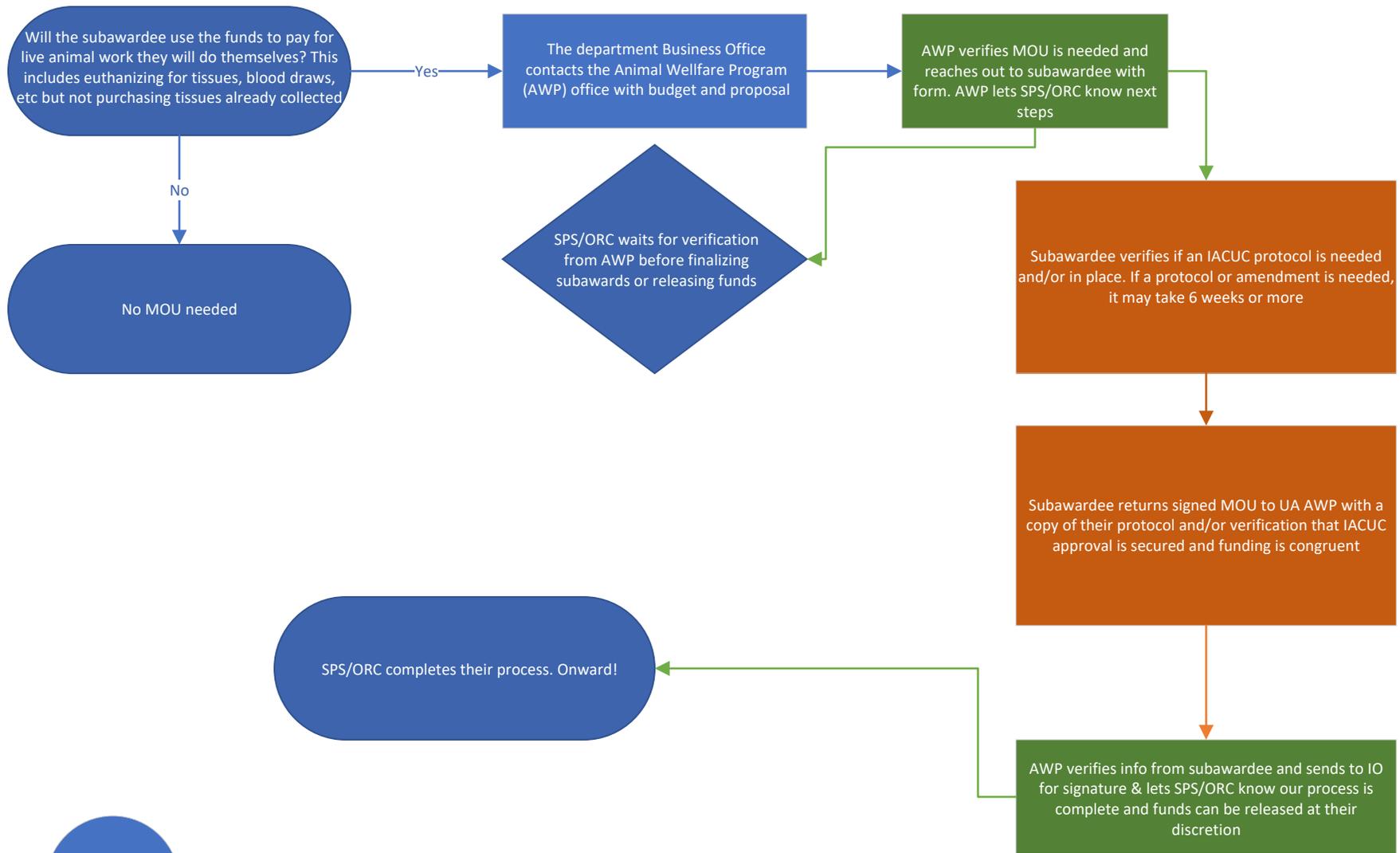
Signature _____

Date:

FDP Tool for Classifying Human Subjects Data

This chart is designed to streamline review of the type of human subject data for the purpose of classification for a DTUA.
Remember to also check your institutional policies and procedures for further guidance.

18 HIPAA Identifiers that comprise Personally Identifiable Information (PII)	HIPAA – Limited Data Set	FERPA – Personally Identifiable Information	
<p>PII may be used alone or with other sources to identify an individual. PII in conjunction with medical records (including payments for medical care) becomes Protected Health Information (PHI).</p> <ol style="list-style-type: none"> 1. Name (including initials) 2. Address (all geographic subdivisions smaller than state: street address, city, county, zip code) 3. All elements (except years) of dates related to an individual (including birthdate, admission date, discharge date, date of death, and exact age if over 89) 4. Telephone numbers 5. Fax number 6. Email address 7. Social Security Number 8. Medical record number 9. Health plan beneficiary number 10. Account number 11. Certificate or license number 12. Any vehicle identifiers, including license plate 13. Device identifiers and serial numbers 14. Web URL 15. Internet Protocol (IP) Address 16. Finger or voice print 17. Photographic image - Photographic images are not limited to images of the face 18. Any other characteristic that could uniquely identify the individual <p>A data set containing any of these identifiers, or parts of the identifier, is considered “identified”</p>	<p>A Limited Data Set must omit all of the HIPAA Identifiers in the left-hand column except for the following:</p> <ol style="list-style-type: none"> 1. City, state, zip code 2. Dates of admission, discharge, service, date of birth, date of death 3. Ages in years, months or days or hours <p>To re-iterate: initials are always considered PHI/PII</p>	<p>In the context of FERPA, PII includes, but is not limited to:</p> <ol style="list-style-type: none"> 1. Student’s name 2. The name of the student’s parent(s) or other family members 3. Address of the student or student’s family 4. Student’s personal identifiers, such as: <ol style="list-style-type: none"> a. Social Security Number; b. Student number; or c. Biometric record (i.e. Finger or voice print) 5. Student’s other indirect identifiers, such as: <ol style="list-style-type: none"> a. Birthdate; b. Place of birth; or c. Mother’s maiden name 6. Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty 7. Information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates 	
	HIPAA – De-identified Data		
			<p>All of the 18 HIPAA Identifiers in the left-hand column must be removed in order for a data set to be considered de-identified with caveats for the following:</p> <ol style="list-style-type: none"> 1. All geographic subdivisions smaller than a state, except for the initial three digits of the ZIP code: (1) The geographic unit formed by combining all ZIP codes with the same three initial digits contains more than 20,000 people; and (2) The initial three digits of a ZIP code for all such geographic units containing 20,000 or fewer people is changed to 000; 2. Ages in years and for those older than 89, all ages must be aggregated into a single category of 90 or older



SPS/ORC Actions

Subawardee Actions

AWP Actions

Simplified Subaward MOU Process