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Kuali Build Subrecipient vs. Contractor Determination Guide

I. PURPOSE

Kuali Build Forms Guide for using the Subrecipient vs. Contractor Determination Form

II. SCOPE

The Subrecipient vs. Contractor Determination Form is used to determine the nature of the relationship between UMass Boston and collaborators on a proposal. This document provides guidance on how to complete the determination form, for additional guidance, please refer to the related resources below.

III. Related Resources

ORSP Grant Lifecycle, Proposal Development: Collaborators
ORSP Forms, Policies, & Processes: Collaborators: Subrecipients & Contractors/Consultants

- Looking Up Entities in SAM.gov guide
- Subrecipient vs. Contractor Determination Form (Kauli Build form)

Kuali Build Guide in the ORSP Kuali (Kuali Build section) – General use and navigation of Kuali Build
Team Assignment in the About Us section of the ORSP website
FDP Clearinghouse
System for Award Management (SAM)

IV. Form Guidance

The Subrecipient vs. Contractor Determination Form includes information at the beginning of the form to help orient you. This document walks through all components of the form, providing guidance on how to complete each section. For general Kuali Build navigation and use, see the Kuali Build guide referenced above.

Using the Subrecipient vs. Contractor Determination Form

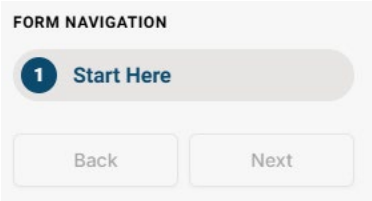
Anyone wishing to add a collaborator to their proposal must complete a Subrecipient vs. Contractor Determination form for each collaborator. Once completed, the form must be uploaded as an attachment to your proposal.

- Initiation
  - The form may be initiated by Department Research Administrators (DRAs) or unit level support staff.
- Form Editing
  - Your form may be saved; you do not need to complete the form in one sitting.
  - The form initiator and DRA Leads will have edit access to the form until it is submitted.

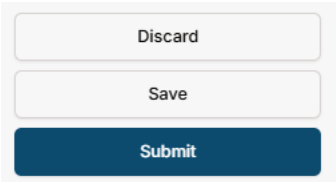
Form Navigation

When the form is initiated, you will begin on the Start Here section. ***Additional fields and pages will become available as you work through the form based on the selections you make.***

You may navigate through the pages using the lefthand navigation menu.



The righthand menu includes action buttons for discarding, saving, or submitting your form.



Start Here Page

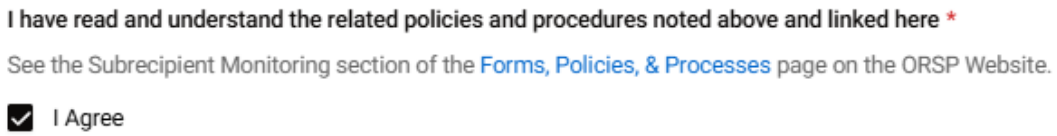
Form Number and Created By

A form number will be automatically generated by Kuali, this is an easy way to reference your request or look for your document in the Kuali Build Document list for this form. (See the Kuali Build Guide referenced above).

Created By will be automatically filled in by Kuali, this is the name of the person who initiated the request form. The person listed here will receive notifications for the request.

I Agree Attestation

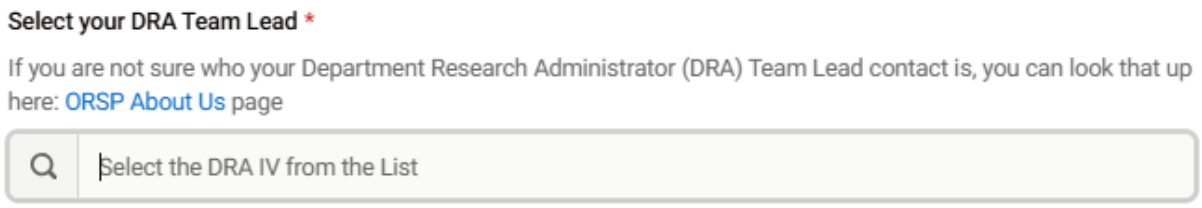
"I have read and understand the related policies and procedures noted above and linked here."
See the Subrecipient Monitoring section of the Forms, Policies, & Processes page on the ORSP Website.



Action Needed: Check the box to confirm

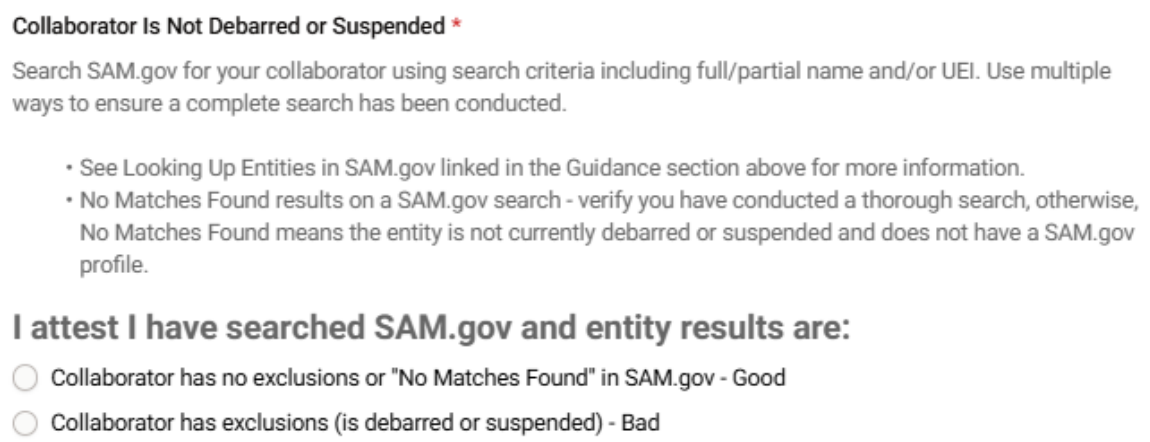
Select your DRA Lead

From the dropdown list provided, select the DRA Lead for your area. There is a link to the ORSP About Us page to lookup your DRA Lead if you are not sure who to select.



Collaborator is Not Debarred or Suspended

Any collaborator listed on your proposal must be reviewed using SAM.gov to ensure they are not debarred or suspended. See the Looking Up Entities in SAM.gov guide linked in the Related Resources section above for more information.

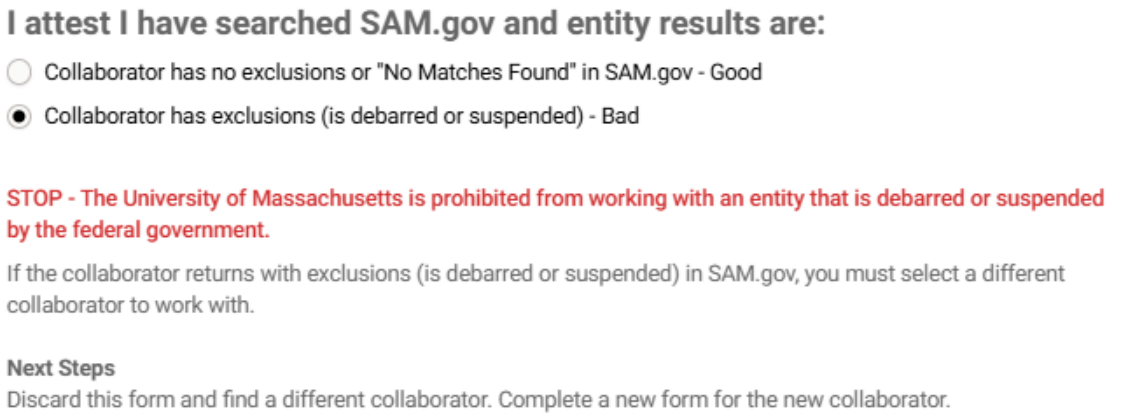


Collaborator has no exclusions

If your collaborator has no exclusions or returns with “No Matches Found” in SAM.gov you may select the first option and continue with entering your Kuali PD Number.

Collaborator has exclusions

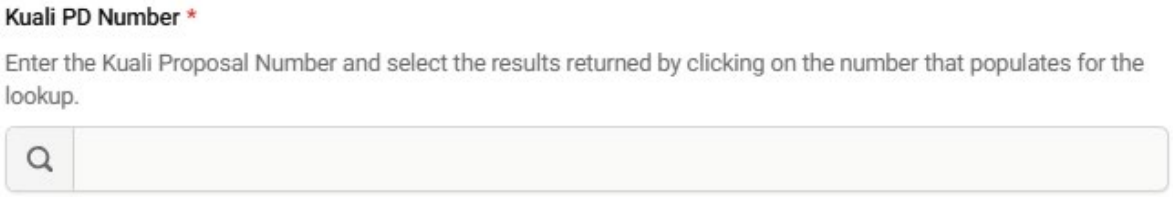
The University of Massachusetts is prohibited from working with an entity that is debarred or suspended by the federal government. If your entity has exclusions, you cannot use that collaborator on your proposal.



Action Needed: Discard the form and find a different collaborator

Kuali PD Number

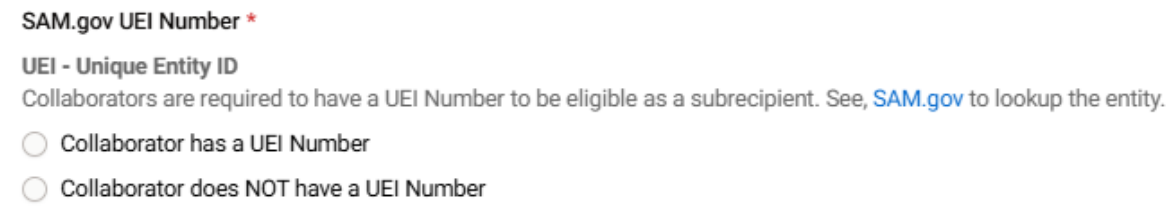
Enter the Kuali Proposal Number and select the valid Kuali Proposal ID Number from the pop-up box below the lookup data field. Once selected, the proposal data will automatically populate below.



Action Needed: Enter and select the Kuali Proposal Number

SAM.gov UEI Number

Unique Entity Identification (UEI) numbers are assigned in SAM.gov, see the Looking Up Entities in SAM.gov guide linked in the Related Resources section above for more information.



Subrecipient Eligibility

- To be eligible as a subrecipient, an entity must have a Unique Entity Identification (UEI) number and not be debarred or suspended.

Contractor/Consultant Eligibility

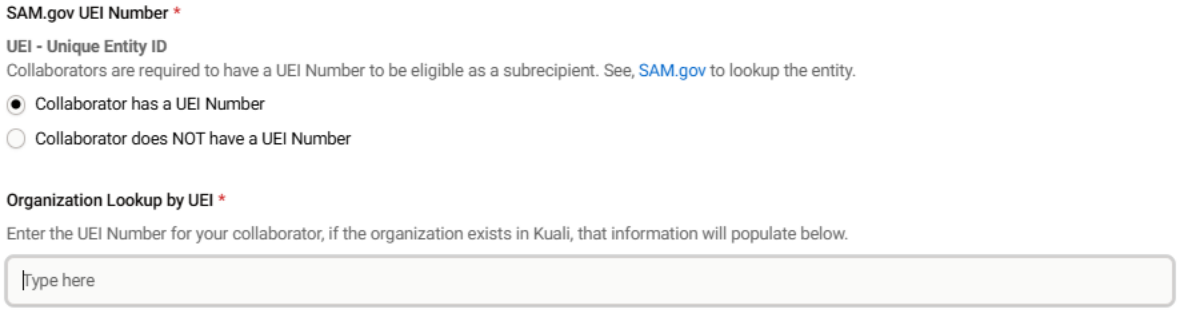
- To be eligible as a contractor, an entity must not be debarred or suspended.
- Contactors are not required to have a UEI number (unless required by the prime sponsor or program requirements).

See the policies and procedures linked in the Related Resources above for more information on eligibility.

Action Needed: Select the option based on whether or not your collaborator has a UEI.

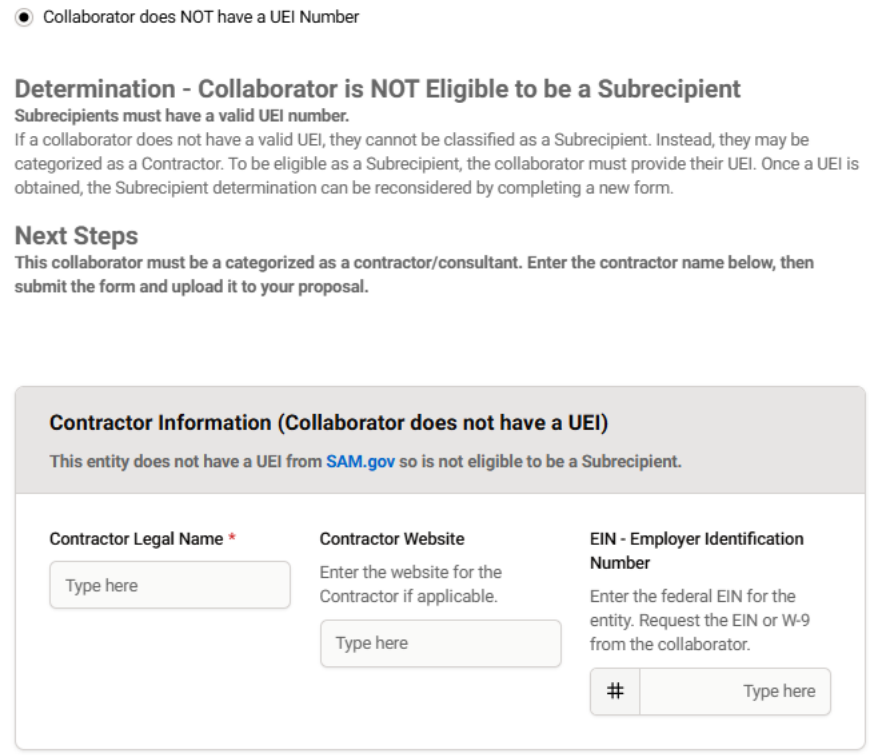
Collaborator has a UEI Number

If your collaborator has a UEI Number, select this option and enter the UEI in the field provided. See Organization Lookup by UEI for more information.



Collaborator does NOT have a UEI Number

If your collaborator does not have a UEI, you will be prompted to capture the Contractor Information and submit the form. Your collaborator must be categorized as a contractor in your proposal.



Organization Lookup by UEI

Enter the UEI Number in the field provided. The form will return with the Organization details if that entity is captured in Kuali.

Organization Lookup by UEI *

Enter the UEI Number for your collaborator, if the organization exists in Kuali, that information will populate below.

ZAU2B2NNVCW4

EIN

58-2190392

Organization Name

SELF ADVOCATES BECOMING EMPOWERED

Address

1455 Englewood Court, Maineville, OH 45039-3506

SAM Expiration Date in Kuali

January 6, 2023

Congressional District

Value 00-000 Denotes a Foreign Entity

OH-001

IRS Designation

Organization Type Description

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

Entity Data Cleanup

Verify the information returned from Kuali is correct and up to date.

Does the UEI entered return the correct entity Information and is it up to date? *

The information returned is pulled from the Organization table in Kuali Research. Check this against your collaborator's information. This question helps us identify records in Kuali that are out of date, any updates needed in Kuali will be forwarded to the eRA Systems team for processing.

- ○ Yes, the Organization details are correct and up to date
- ○ No, the Organization needs to be updated in Kuali

Select Yes if the entity information is correct and update to date.

Selecting No provides an opportunity to input any corrections needed, this will be forwarded to the eRA Systems group for updating in Kuali. Note - The most common update is the SAM.gov registration is expired in Kuali.

Does the UEI entered return the correct entity Information and is it up to date? *

The information returned is pulled from the Organization table in Kuali Research. Check this against your collaborator's information. This question helps us identify records in Kuali that are out of date, any updates needed in Kuali will be forwarded to the eRA Systems team for processing.

- ○ Yes, the Organization details are correct and up to date
- ● No, the Organization needs to be updated in Kuali

Check your UEI Number to ensure it is entered correctly

If the number entered is correct, but the Organization details are wrong, please check the boxes below for the corrections needed.

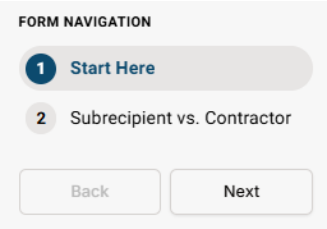
Update Organization in Kuali *

Let us know what is incorrect in the details returned for your entity, ORSP will review and make updates using SAM.gov as our reference.

Check all that apply

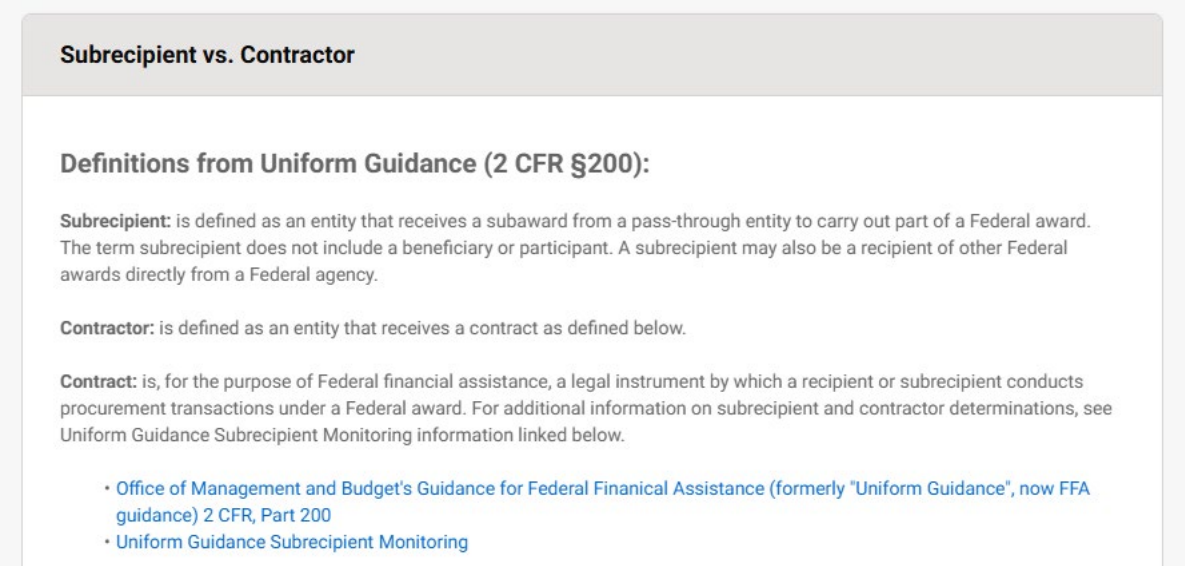
- ☐ SAM.gov registration is expired in Kuali
- ☐ Name is incorrect
- ☐ Address is incorrect
- ☐ Type Description is incorrect
- ☐ Other - Explain in comments

Select Next in the lefthand navigation to move into the determination section of the form.



Subrecipient vs. Contractor Page

In this section of the form you will be guided through making a determination of subrecipient vs. contractor for your collaborator. The first part of this page includes definitions and resources to assist you in this process.



Subrecipient vs. Contractor

Definitions from Uniform Guidance (2 CFR §200):

Subrecipient: is defined as an entity that receives a subaward from a pass-through entity to carry out part of a Federal award. The term subrecipient does not include a beneficiary or participant. A subrecipient may also be a recipient of other Federal awards directly from a Federal agency.

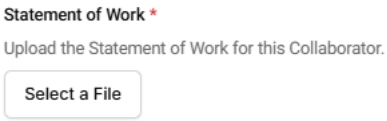
Contractor: is defined as an entity that receives a contract as defined below.

Contract: is, for the purpose of Federal financial assistance, a legal instrument by which a recipient or subrecipient conducts procurement transactions under a Federal award. For additional information on subrecipient and contractor determinations, see Uniform Guidance Subrecipient Monitoring information linked below.

- Office of Management and Budget's Guidance for Federal Finanical Assistance (formerly "Uniform Guidance", now FFA guidance) 2 CFR, Part 200
- Uniform Guidance Subrecipient Monitoring

Statement of Work

Here you will upload the Statement of Work for your collaborator. The statement of work is a fundamental component in determining the nature of the relationship between the university and the collaborator.



Statement of Work *

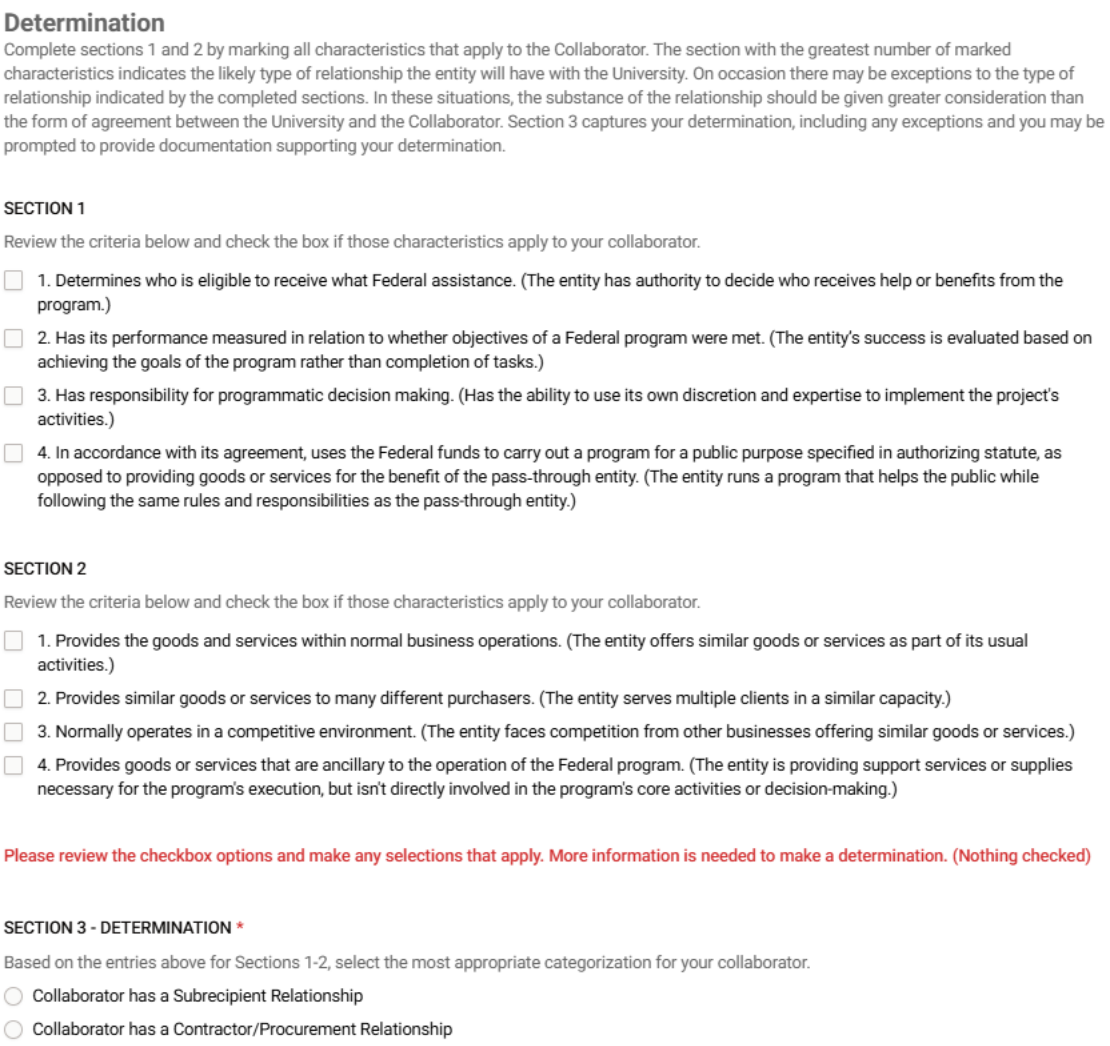
Upload the Statement of Work for this Collaborator.

Select a File

Action Needed: Upload the Statement of Work for your collaborator.

Determination

The Determination is comprised of 3 sections. Sections 1 & 2 compare different characteristics that might apply to your collaborator. Section 3 is where you select your determination based on the results of those selected characteristics.



Determination

Complete sections 1 and 2 by marking all characteristics that apply to the Collaborator. The section with the greatest number of marked characteristics indicates the likely type of relationship the entity will have with the University. On occasion there may be exceptions to the type of relationship indicated by the completed sections. In these situations, the substance of the relationship should be given greater consideration than the form of agreement between the University and the Collaborator. Section 3 captures your determination, including any exceptions and you may be prompted to provide documentation supporting your determination.

SECTION 1

Review the criteria below and check the box if those characteristics apply to your collaborator.

- ☐ 1. Determines who is eligible to receive what Federal assistance. (The entity has authority to decide who receives help or benefits from the program.)
- ☐ 2. Has its performance measured in relation to whether objectives of a Federal program were met. (The entity's success is evaluated based on achieving the goals of the program rather than completion of tasks.)
- ☐ 3. Has responsibility for programmatic decision making. (Has the ability to use its own discretion and expertise to implement the project's activities.)
- ☐ 4. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity. (The entity runs a program that helps the public while following the same rules and responsibilities as the pass-through entity.)

SECTION 2

Review the criteria below and check the box if those characteristics apply to your collaborator.

- ☐ 1. Provides the goods and services within normal business operations. (The entity offers similar goods or services as part of its usual activities.)
- ☐ 2. Provides similar goods or services to many different purchasers. (The entity serves multiple clients in a similar capacity.)
- ☐ 3. Normally operates in a competitive environment. (The entity faces competition from other businesses offering similar goods or services.)
- ☐ 4. Provides goods or services that are ancillary to the operation of the Federal program. (The entity is providing support services or supplies necessary for the program's execution, but isn't directly involved in the program's core activities or decision-making.)

Please review the checkbox options and make any selections that apply. More information is needed to make a determination. (Nothing checked)

SECTION 3 - DETERMINATION *

Based on the entries above for Sections 1-2, select the most appropriate categorization for your collaborator.

- ○ Collaborator has a Subrecipient Relationship
- ○ Collaborator has a Contractor/Procurement Relationship

As you check boxes for characteristics, related messages populate providing guidance for your determination.

Selections are Incompatible

Note that some combinations of selections are incompatible. If that is the case, you will see a validation error message similar to this populate:

Selections are Incompatible

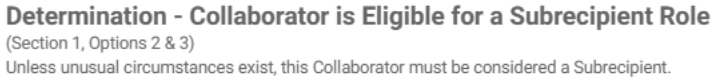
A Collaborator may not simultaneously have both responsibility for programmatic decision making (Section 1, box 3) AND provide goods or services that are ancillary to the operation of the Federal program (Section 2, box 4).

A form with this kind of message cannot be submitted until different characteristics are selected. Review your statement of work to ensure you are correctly characterizing the collaborator's work on this proposal.

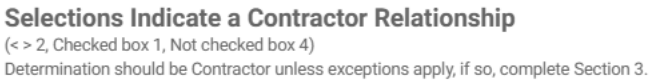
Determination Guidance

Based on characteristics selected you will see messages that provide a Determination or an Indication. These are designed to guide you in your determination.

Example of a Determination message:

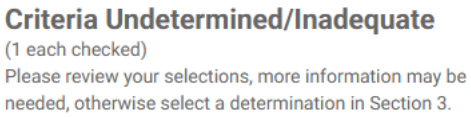


Example of an Indication message:



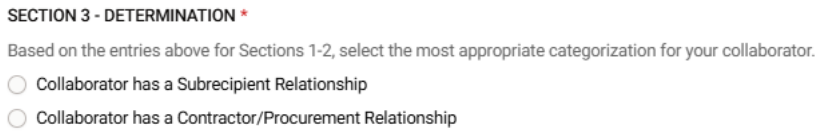
Criteria Undetermined/Inadequate

This type of message will populate if the selections between sections 1 & 2 are equitable. You are prompted to review your selections and can move forward with making your own determination if no additional characteristics are applicable.

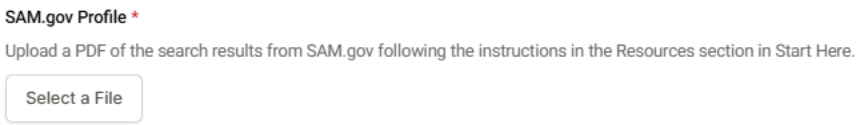


Section 3 Determination

Here you are prompted to select the most appropriate categorization for your collaborator.



Anytime Subrecipient is selected, you will be prompted to upload the results of your SAM.gov search.



Additional messages may populate based on your responses and how they relate to the characteristics selected.

Scope May Not Support a Contractor Relationship

This message populates if Contractor is selected in Section 3 when the characteristics selected in Sections 1 & 2 indicate a Subrecipient relationship.

Scope May Not Support a Contractor Relationship
(Section1, Option 2 & 3 selected)
You have selected Contractor in Section 3 which does not match the characteristics selected in Section 1.
- Your scope is may be inconsistent with your determination.
- This form will route to the ORSP Subaward Administrator, they will provide guidance on this determination.

Scope may be inconsistent with your Subrecipient Determination

This message populates if Subrecipient is selected in Section 3 when the characteristics selected in Sections 1 & 2 indicate a Contractor relationship.

Scope may be inconsistent with your Subrecipient Determination
(Section2, Option 1 and 4 selected)
You have selected Subrecipient in Section 3 which does not match the characteristics selected in Section 2.
- Your scope is likely inconsistent with your determination or with the requirements in your Notice of Funding Opportunity (NOFO).
- This form will route to the ORSP Subaward Administrator, they will provide guidance on this determination.

This message also prompts an upload of the Notice of Funding Opportunity to support your determination of Subrecipient.

Notice of Funding Opportunity *
Upload the Notice of Funding Opportunity (NOFO), Program Requirements, or Application Guidelines for this Proposal to support your selection in Section 3 of Subrecipient.
Select a File

Section 3 Comments

This field provides an opportunity to capture any additional comments or information that might be helpful.

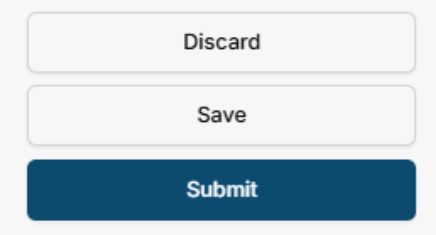
SECTION 3 - COMMENTS
Capture any additional comments or information that might be helpful here (optional)
Type here

Next Steps

A Next Steps message will populate that provides an overview of any additional review or approval that may be required.

Submission

Once you have completed the form, click Submit on the right.

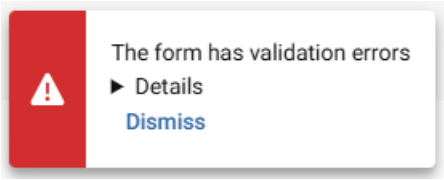


Action Needed: Click the Submit button in the upper right corner of the form

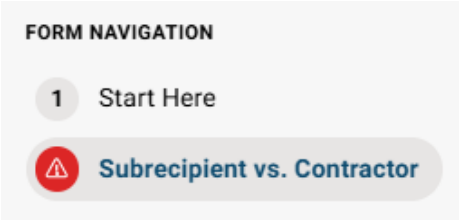
Validation Errors

An error message will appear if the required fields on the form are incomplete. If this happens, review the form and complete any field you may have missed. Required fields are marked with a red asterisk.

Example of an error message:



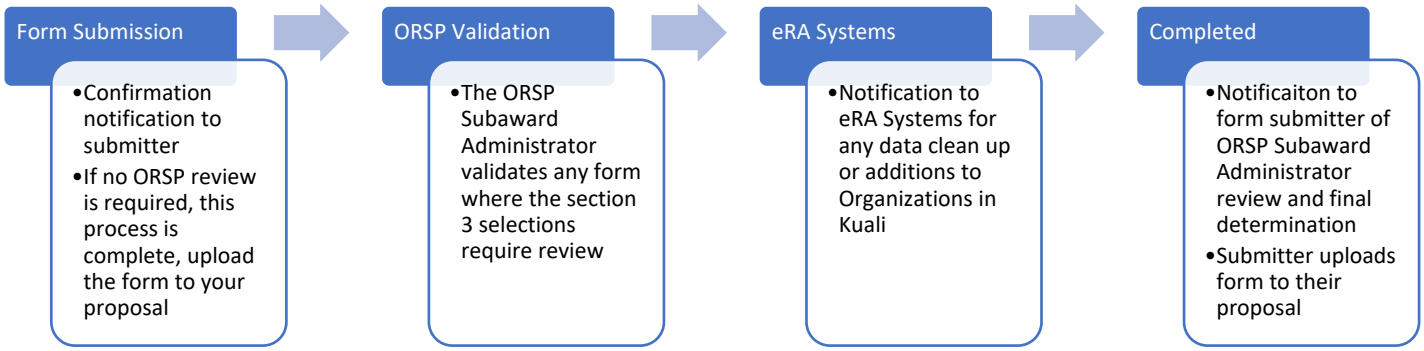
The Pages menu on the left will alert you to which pages contain the validation errors.



Once all required fields have been completed, you should be able to complete the submit action.

Workflow

Below is an overview of the workflow steps for the Subrecipient vs. Contractor Determination form. Notifications are sent by the Kuali system through the Completed step.



ORSP Validations

ORSP Validations are triggered in the following scenarios:

- Subrecipient is selected in Section 3 when Section 2 options 1 and/or 4 are selected, which triggers a Contractor/Procurement determination message.

- Contractor is selected in Section 3 when Section 1 options 2 and/or 3 are selected, which triggers a Subrecipient determination message
- A For Profit entity has Subrecipient override selected

Validations route to the ORSP Subrecipient Preaward staff who reviews the supporting documentation provided and makes a final determination. This is communicated to the submitter in the notification they receive once this process is completed.

Troubleshooting/Questions

Technical questions involving how to complete the form or viewing the status of your application – Please review the Kuali Build guide linked above or reach out to ORSP Training and Education at ORSPTraining@umb.edu

Policy or process questions, please review the resources linked above or reach out to your DRA contact, see the ORSP Contacts by Department page.