

**SUBRECIPIENT vs. VENDOR/CONTRACTOR/PROFESSIONAL SERVICE
DETERMINATION CHECKLIST**

Reference OMB Uniform Guidance 2 CFR 200.330 (also 200.93 and 200.23)

In the performance of research and sponsored programs, Lehigh University may wish to collaborate with other organizations in order to obtain services or materials, perform tasks, or achieve objectives. Principal Investigators may wish to enter into agreements with such organizations either during the proposal stage or after receiving a Federal award. The relationship of the collaborating organization to the fulfillment of the need is crucial to determining the form of procurement, the awarding of funds, and the responsibilities with regard to compliance.

Definitions:

Subaward/subrecipient: A subaward relationship is created for the purpose of carrying out a portion of the project and creates a Federal assistance relationship with the subrecipient, with scholarly or scientific responsibilities. Does not include an individual that is a beneficiary of such program.

Vendor/Contractor/Professional Service: A contract, agreement, and/or purchase order is created for the purpose of obtaining goods and services for Lehigh's own use or use of the beneficiaries of the program, and creates a procurement/vendor relationship with a company, merchant, or other seller providing goods or services.

Name of Organization: _____

Check YES or NO for each question below

SUBRECIPIENT ("Yes" indicates the collaborating organization has the characteristics of a Subrecipient).

YES	NO	Will the collaborating organization:
		1. Determine who (within the organization) is eligible to receive what Federal funding?
		2. Have its performance measured against whether the objectives of the Federal program are met?
		3. Have responsibility for programmatic decision-making?
		4. Have responsibility for adherence to applicable Federal program compliance requirements?
		5. Use the Federal funds it receives to carry out a portion of the research program specified in the authorizing document (as opposed to providing goods or services for the benefit of Lehigh)?

VENDOR/CONTRACTOR/PROFESSIONAL SERVICE ("Yes" indicates the collaborating organization has the characteristics of a vendor, contractor, or service provider).

YES	NO	Will the collaborating organization:
		1. Provide the goods and services within normal business operations?
		2. Provide similar goods and services to many different purchasers?
		3. Normally operate in a competitive environment?
		4. Provide goods or services that are ancillary (secondary) to the operation of a Federal program?
		5. Have no responsibility to comply with requirements of the Federal program as a result of the agreement?

In making the determination of whether a subrecipient or vendor relationship exists, the substance of the relationship is more important than the form of the agreement. This checklist is typically used for organizations; for determining the status of an individual as a consultant or a vendor, see *Consultant Policy and Forms* at <http://research.cc.lehigh.edu/policies>. See also *Subcontracting Policy* at <http://research.cc.lehigh.edu/policies>.

The organization is determined to be (check one): **Subrecipient** _____ **Vendor/Contractor/Professional Service:** _____

Principal Investigator: _____ Date: _____

Office of Research and Sponsored Programs: _____ Date: _____