

Tuesday Tips is a new outreach effort by OGCA. The idea behind *Tuesday Tips* is to convey tips, tricks and other helpful information around the area of research administration. Our goal is to post on (almost every) Tuesdays. If there is something you would like to see covered on *Tuesday Tips*, email: UAF-GCReATE@alaska.edu. For more Tips visit [OGCA website](#).

Distinguishing between subrecipient, subawardee, vendor, and contractor

Under the OMB Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, which went into effect on 12/16/2014, the term “vendor” was replaced with “contractor.” The terms vendor and contractor substantially have the same meaning and may be

contractor based on the nature of the agreement and the criteria in 2 CFR §200.330.

Subrecipient vs. contractor determination must be made and documented at the proposal stage using the Federal Demonstration Partnership (FDP) tool determining [Subrecipient vs. Contractor Checklist](#).

- x The entity regards itself, and/or is regarded by UAF, as “engaged in research” involving human subjects under the [Common Rule](#) and therefore requires approval for its interactions with human subjects.

Subagreements should have a detailed scope of work, budget and a budget justification/narrative that specifies salary, fringe, supplies, and other direct costs, as well as appropriate F&A costs consistent with the subrecipient’s indirect cost rate. Terms and conditions from a prime award are typically imposed on the subrecipient to the same degree that they are imposed on UAF as the prime recipient.

Contractor (Vendor): A contractor (vendor) relationship (including that of an individual acting as a vendor of consulting services) is appropriate when:

x

1. Determines who is eligible to receive what financial assistance;
2. Has its performance measured against whether the objectives of the federal program are met;
3. Has responsibility for programmatic decision-making;
4. Has responsibility for adherence to applicable federal program compliance responsibilities; and
5. Uses the federal funds to carry out a program of the organization as compared to providing goods and services for a program of the pass-through entity.

Under the Uniform Guidance (2 CFR

Subrecipient - Subrecipient means a non-federal entity that receives a subaward from a pass-through entity to carry out a part of a federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other federal awards