

Date: (mm/dd/yy)

# SUBRECIPIENT COMMITMENT FORM

## SUBRECIPIENT INFORMATION

Subrecipient Legal Name:

Subrecipient's PI:

:

Prime Sponsor:

Proposal Title:

Subrecipient Total Funds Requested:

Performance Period Begin: (mm/dd/yy)

Performance Period End: (mm/dd/yy)

## SECTION A: Proposal Documents

The following documents are included in our subaward proposal submission and covered by the certifications below:

- Statement of Work (required)
- Budget and Budget Justification (required)
- This Subrecipient Commitment Form (required) completed and signed by Subrecipient's Authorized Official
- Small/Small Disadvantaged Business Subcontracting Plan, in agency-required format (required for proposals over \$550,000)
- Biosketches of Key Personnel in agency-related format

Other

## SECTION B: Special Review and Certifications

1. **Facilities and Administrative Rates** included in this proposal have been calculated based on:

- Subrecipient's federally-negotiated F&A rates for this type of work, or a reduced F&A rate that Subrecipient hereby agrees to accept. (If this box is checked, a copy of your F&A rate agreement must be furnished Concord University before a subaward will be issued.)
- Other rates (please specify the basis on which the rate has been calculated in Section D: Comments)
- Not applicable (no indirect cost requested)

2. **Fringe Benefit Rates** included in this proposal have been calculated based on:

- Rates consistent with or lower than Subrecipient's federally-negotiated rates. (If this box is checked, a copy of your FB rate agreement must be furnished to Concord University before a subaward will be issued.)
- Based on actual rates.
- Other rates (please specify the basis on which the rate has been calculated in Section D: Comments)

3. **Subrecipient Business Status:**

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Large Business | <input type="checkbox"/> Institution of Higher Education | <input type="checkbox"/> Foreign Owned           |
| <input type="checkbox"/> Small Business | <input type="checkbox"/> Nonprofit Organization          | <input type="checkbox"/> For profit organization |

If a small business, identify business classification (\*certified by the Small Business Administration)

- |   |   |
|---|---|
| <input type="checkbox"/> Small Disadvantaged Business (SDB)* (8a)*                | <input type="checkbox"/> Service-disabled veteran-owned business (SDVOSB) |
| <input type="checkbox"/> Women-owned small business (WOSB)                        | <input type="checkbox"/> HUBZone small business*                          |
| <input type="checkbox"/> Veteran-owned small business (VOSB)                      | <input type="checkbox"/> Alaska Native Corporation (ANC) (43USC1601)      |
| <input type="checkbox"/> Minority Serving Institution (e.g., HBCU, HSI, MI, etc.) |   |

4. **Affirmative Action Compliance:**

Indicate in accordance with the rules and regulations of the Secretary of Labor (41 CFR 60-1 and 60-2) that your organization has:

- a written affirmative action program has been developed and is on file
- a written affirmative action program has not been developed and is not on file
- not previously had contracts subject to the written affirmative action programs

5. **Human Subjects:**  Yes  No

Exemption Number or IRB Approval Date: (mm/dd/yy)

IRB Number:

(Note: Surveys, interviews, observations, or use of secondary data may be considered human subjects research. Contact your institution's IRB office for guidance.)

If answer to the above is "Yes" copies of the determination of exemption or IRB approval must be provided before any subaward will be issued. Please send the documents to Concord University as soon as they become available.

**If "Yes" and NIH funding is involved**

Have all key personnel involved completed human subjects training?  Yes  No

Note: All key personnel engaged in human subjects research must take NIH human subjects research training or other human subjects research training ([http://grants.nih.gov/grants/policy/hs\\_educ\\_faq.htm](http://grants.nih.gov/grants/policy/hs_educ_faq.htm)) as required by NIH.

Does your organization/institution have a Federalwide Assurance (FWA) Number?  Yes  No If "Yes" provide number:

6. **Animal Subjects:**  Yes  No Approval Date:(mm/dd/yy)

IACUC Number:

If "Yes" copies of the IACUC approval must be provided before any subaward will be issued. Please obtain approval and forward required documents as soon as they become available.

Does your organization/institution have a PHS Animal Welfare Assurance Number?  Yes  No If "Yes" provide number:

Is your organization/institution AAALAC accredited?  Yes  No If "Yes" provide number:

7. **Responsible Conduct of Research (RCR):**

The prime sponsor of this project is:

**National Institutes of Health**

**Policy:** NIH requires that all trainees, fellows, participants, and scholars receiving support through any NIH training, career development award (individual or institutional), research education grant, and dissertation research grant must receive instruction in responsible conduct of research. This policy will take effect with all new and renewal applications submitted on or after January 25, 2010, and for all continuation (Type 5) applications with deadlines on or after January 1, 2011. This Notice applies to the following programs: D43, D71, F05, F30, F31, F32, F33, F34, F37, F38, K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, K99/R00, KL1, KL2, R25, R36, T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2, and U2R. This policy also applies to any other NIH-funded programs supporting research training, career development, or research education that require instruction in responsible conduct of research as stated in the relevant funding opportunity announcements.

**Compliance:** NIH policy requires participation in and successful completion of instruction in responsible conduct of research by individuals supported by any NIH training/research education/fellowship/career award. It is expected that course attendance is monitored and that a certificate or documentation of participation is available upon course completion. NIH does not require certification of compliance or submission of documentation, but expects institutions to maintain records sufficient to demonstrate that NIH-supported trainees, fellows, and scholars have received the required instruction.

**Resources:** The NIH Research Training website (<http://grants.nih.gov/training/extramural.htm>) includes additional information on instruction in responsible conduct of research and links to the Office of Research Integrity (<http://ori.hhs.gov/>), links to instructional materials, and examples of programs that have been regarded as good models for instruction in responsible conduct of research (<http://bioethics.od.nih.gov/researchethics.html>). The National Academy Press has published the 3rd. edition of the classic, *On Being a Scientist*, and is available online at [http://books.nap.edu/catalog.php?record\\_id=12192](http://books.nap.edu/catalog.php?record_id=12192)

**National Science Foundation**

**Statutory Requirement:** "The Director shall require that each institution that applies for financial assistance from the Foundation for science and engineering research or education describe in its grant proposal a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research project."

**Certification Regarding Responsible Conduct of Research (RCR):**

The AOR is required to complete a certification that the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research. Additional information on NSF's Responsible Conduct of Research (RCR) policy is available in the Award and Administration Guide (AAG), Chapter IV.B.

**Institutional Responsibilities:**

- A. An institution must have a plan in place to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research. As noted in NSF Grant Proposal Guide (GPG) Chapter II.C.1e, institutional certification to this effect is required for each proposal.
- B. **While training plans are not required to be included in proposals submitted to NSF, institutions are advised that they are subject to review, upon request.**
- C. An institution must designate one or more persons to oversee compliance with the Responsible RCR training requirement.
- D. Institutions are responsible for verifying that undergraduate students, graduate students, and postdoctoral researchers supported by NSF to conduct research have received training in the responsible and ethical conduct of research.

8. **Cost Sharing:**

Yes  No Amount

(Cost sharing amounts and details should be included in the Subrecipient's budget)

9. **Conflict of Interest** (applicable to DHHS, NSF, or any other sponsor that has adopted the revised 2012 federal financial disclosure requirements):

Not applicable because this project is not being funded by NIH, NSF, CDC or any other sponsor as described, above.

Subrecipient hereby certifies that it has an active and enforced conflict of interest policy that is consistent with the provision of 42 CFR Part 50, Subpart F "Responsibility of Applicants for Promoting Objectivity in Research". Subrecipient also certifies that, to the best of the institution's knowledge: (1) all financial disclosures have been made related to the activities that may be funded by or through a resulting agreement, and required by its conflict of interest policy; and, (2) all identified conflicts of interest have, or will have, been satisfactorily managed, reduced or eliminated in accordance with Subrecipient's conflict of interest policy prior to the expenditure of any funds under any resultant agreement.

Subrecipient does not have an active and/or enforced conflict of interest policy and hereby agrees to abide by Concord University's policy. Please follow this link for further instructions on providing disclosure and training documentation.

10. **Fiscal Responsibility:**

The Subrecipient certifies that its financial system is in accordance with generally accepted accounting principles and (mark all that apply):

- has the capability to identify, in its accounts, all Federal awards received and expended and the Federal programs under which they are received
- maintains internal controls to assure that it is managing Federal awards in compliance with applicable laws, regulations and the provision of contracts and grants
- complies with applicable laws and regulations
- can prepare appropriate financial statements, including the schedule of expenditures of Federal awards
- there are no outstanding audit findings. If there are findings, submit a copy of the most recent report that describes the findings and steps to be taken to correct the finding.

11. **Debarment, Suspension, Proposed Debarment:**

Is the PI or any other employee or student participating in this project debarred, suspended or otherwise excluded from or ineligible for participation in Federal assistance programs or activities?  Yes  No

The Subrecipient certifies that they: (answer all questions below)

- Are  Are Not presently debarred, suspended, proposed for debarment, or declared ineligible for award of Federal Contracts
- Are  Are Not presently indicted for, or otherwise criminally or civilly charged by a governmental entity
- Have  Have Not within three (3) years preceding this offer, been convicted of or had a civil judgment rendered against them for commission of fraud or criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or Local) contract or subcontract; violation of Federal or State antitrust statutes relating to the submission of offers; or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property
- Have  Have Not within three (3) years preceding this offer, had one or more contracts terminated for default by any Federal Agency

**SECTION C: Audit Status**

1. **A-133 Audit Status**

A. Does the Subrecipient receive an annual audit in accordance with OMB Circular A-133?  Yes  No

If "Yes", has the audit been completed for the most recent fiscal year?  Yes  No

If "No", when is it expected to be completed: (m/d/yy)

B. Were any audit findings reported? (If "yes", explain in Section D: Comments below)  Yes  No

*Note: A complete copy of Subrecipient's most recent report, or the Internet URL link to a complete copy must be furnished to Concord University before a subaward will be issued.*

C. If "No", does the Subrecipient receive overall federal funding of at least \$500,000 per year?  Yes  No If "No", skip Item D

- D. Subrecipient is a:
- For-profit entity that expends Federal or Sub-Federal funds and has a DCAA audited rate
  - For-profit entity that does not expend Federal funds or have annual audits
  - Foreign entity

*Note: If Subrecipient does not receive an A-133 audit, Concord University will require the Subrecipient to complete an Audit Certification and Financial Status Questionnaire, and may require a limited scope audit before a subaward will be issued.*

2. **Federal Funding Accountability and Transparency Act (FFATA)**

Location of Subrecipient (City/State/Congressional District/County):

*Note: If primary place of performance is different than Location of Subrecipient, provide location where project will be performed (City/State/Congressional District/Country)*

UEI Number of Subrecipient receiving award:

Is Subrecipient owned or controlled by a parent entity?  Yes  No

If "Yes", please provide DUNS number and location (City/State/Congressional District/Country) of parent entity.

Is Subrecipient currently registered in the System for Award Management ([www.sam.gov](http://www.sam.gov))?  Yes  No

**SECTION D: Comments** (please attach additional pages if necessary)

## APPROVED FOR SUBRECIPIENT

The information, certifications, and representations above have been read, signed, and made by an authorized institutional representative of the Subrecipient named herein. The appropriate programmatic and administrative personnel involved in this application are aware of agency policies in regard to subawards and are prepared to establish the necessary inter-institutional agreements consistent with those policies. By their signatures below, Subrecipient and its Principal Investigator certify (1) that the information submitted within the application is true, complete and accurate to the best of the Subrecipient's and PI's knowledge; (2) that any false, fictitious, or fraudulent statements or claims may subject the Institution and PI to criminal, civil, or administrative penalties; and (3) that the PI agrees to accept responsibility for the scientific conduct of the project and to provide the required progress and other administrative reports as required if an award is made as a result of the prime recipient's application. Any work begun and/or expenses incurred prior to execution of a subaward agreement are at the Subrecipient's own risk.

Joint Research. This submission shall be understood to be a joint research agreement in accordance with 35 U.S.C. 103(c)(3) for activities contemplated herein. The scope of such joint research may be amended from time to time by agreement between the principal investigator(s) and their designee(s).

Signature of Subrecipient's Authorized Institutional Representative

Date

Signature of Subrecipient's Principal Investigator

Date

Name and Title of Authorized Institutional Representative

TIN or EIN of Subrecipient's Organization/Institution

Address

City, State, Zip

Email Address

Name and Title of Administrative Point of Contact

Address

City, State, Zip

Phone

Fax

Email Address