
Subrecipients and Vendors

June 6, 2006

Whenever another entity does work for OHSU on a sponsored project, the determination needs to be made if the entity is a subrecipient or a vendor. If the entity is included on the application, RGC and the PI decide which it is, based on factors listed below. If it is not on the application, Logistics and/or RGC make the determination at the point in time when services are being requested.

Subrecipient:

- Entity that expends Federal awards received from a pass-through entity to carry out a Federal program
- Does not include an individual that is a beneficiary of such a program
- May also be a recipient of other Federal awards directly from a Federal awarding agency
- Has more than \$500,000 in expenditures on all Federal awards
- Is a not-for-profit entity
- Is subject to A-133 audit monitoring
- Requires an executed Subrecipient Agreement initiated by RGC
- These transactions should be charged to GR.Subcontractor Expenditure category
- Subrecipients perform a significant amount of the proposed/approved project and maintain control over their work. Examples of appropriate subrecipient arrangements include a Co-Investigator who has expertise in analyzing and compiling genome data; or a portion of project that provides outreach services to a community based entity. Generally, these arrangements are dependent on the expertise of subrecipients and are not generally available for purchase.

Vendor:

- Dealer, distributor, merchant or other seller providing goods or services that are required for the conduct of a Federal program, i.e., is in the business of developing software for a specific purpose; gene sequencing, lab testing, evaluation services, educational consultants. These services may usually be competitively purchased.
- These goods or services may be for an organization's own use or for the use of beneficiaries of the Federal program
- May or may not have less than \$500,000 in expenditures on all Federal awards
- Is a for-profit entity
- May be a foreign company
- Is not subject to A-133 monitoring
- If the entity is a vendor, it receives a Personal Services Contract initiated and executed by Logistics Consultant Agreements and Letters of Agreement (if the service is less than \$10,000 dollars and is a vendor service) are negotiated and executed by RGC.

Personal Services Contract

- Is completed by Logistics
- Has liability insurance coverage in the amounts required by OHSU
- Does not work with Intellectual Property issues
- Does not work with animal or human subjects
- Contract may exceed \$10,000
- These transactions should be charged to GR.Other Professional Services

Letter of Agreement

- Is completed by RGC
- Does not have liability insurance coverage in the amounts required by OHSU
- Works with Intellectual Property issues
- Works with animal or human subjects
- Less than \$10,000 for individuals or small companies

- Contractee is an individual or an entity and they are providing a consulting service and do not meet the requirements for a subrecipient
- These transactions should be charged to GR.Other Professional Services

Consulting Agreements

- Is completed by RGC
- Is an entity providing consulting service and does not meet the requirements for a subrecipient
- Is greater than \$10,000 for individuals or small companies.