



Non-FDP Participant – Subrecipient Commitment Form

All Subrecipients who anticipate funding under a federal or non-federal award must complete this form when participating as a Subrecipient in a proposal submitted by Utah State University. This form provides a checklist of documents and certifications required by the Prime Sponsors and must be endorsed by the Subrecipient's Authorized Organizational Representative (AOR) prior to submission. Be sure to include all relevant attachments. **Links to USU webpages are included to provide clarification but do not replace your own Institutions policies and procedures.**

| Utah State University Information (To be filled out by USU) | | | | | | | | | | |
|--|--|-----------|---|-------------|---|---|-----|----------|--|--|
| USU PI | | | | | | Kuali Proposal # | | | | |
| Prime Sponsor | | | | | | | | | | |
| Project Title | | | | | | | | | | |
| Required Documents (To be filled out by USU) | | | | | | | | | | |
| <i>The following checked documents are REQUIRED to be submitted with your proposal and are covered by the Certifications below:</i> | | | | | | | | | | |
| | Scope of Work | | Detailed Budget | | Budget Justification | | | | | |
| | Key Personnel Biosketch (s) | | Current, Pending, & Other Support | | Facilities & Other Resources | | | | | |
| | Completed Subrecipient Commitment Form | | Letter of Commitment (Signed by Subrecipient's AOR) | | Federally Negotiated Indirect Cost Rate Agreement (NICRA) | | | | | |
| | Third-Party Cost Share Commitment Form | | Small Business Subcontracting Plan (<i>Applicable only to contracts governed by the FAR and expected to exceed \$900,000, in accordance with FAR 19.702 & 19.704</i>) | | | | | | | |
| Subrecipient Institution Information | | | | | | | | | | |
| <i>(The remaining sections are to be completed by the Subrecipient)</i> | | | | | | | | | | |
| Member/Participant of FDP Expanded Clearinghouse (If yes, please complete the alternate Subrecipient Commitment Form for FDP Expanded Clearinghouse Participants.) | | | | | | | Yes | No | | |
| Institution | | | | | | UEI | | | | |
| PI Name | | | | | | EIN | | | | |
| eRA Commons ID (if applicable) | | | | | PI Phone | | | PI Email | | |
| Project Start Date | | | | | Project End Date | | | | | |
| Performance Site Address | | | | | | Performance Site Congressional District # | | | | |
| Direct Costs | | F&A Costs | | Total Costs | | F&A Rate | | MTDC/TDC | | |
| Subrecipient Contacts | | | | | | | | | | |
| Administrative | | | | | | Email | | | | |
| Title | | | | | | Phone | | | | |
| Authorized Official | | | | | | Email | | | | |
| Title | | | | | | Phone | | | | |



| Subrecipient scope of work includes the following: (Check all that apply) | | | | | |
|--|---|------------------------------------|-----|---|-----|
| | Yes | | Yes | | Yes |
| Human Subjects | | Vertebrate Animals | | Anticipated CUI and/or CMMC | |
| Human Embryonic Stem Cells | | Select Agents | | Export-Controlled Work Anticipated | |
| Program Income | | Recombinant DNA | | Anticipated Intellectual Property | |
| Cost Sharing/Match/In-kind | | Amount | | <i>If Subrecipient is committing cost share, complete a USU Third Party Cost Share Commitment Form and return with this form.</i> | |
| Certifications (Initial where indicated if applicable; otherwise, check N/A.) | | | | | |
| Malign Foreign Talent Recruitment Program | Subrecipient organization certifies that the Principal Investigator (PI) and any other Senior/Key Personnel identified in this proposal are not currently participating in, and will not participate in, a Malign Foreign Talent Recruitment Program (MFTRP), as defined in Section 10631 of the CHIPS and Science Act of 2022. This certification is required by USU policy, regardless of whether the project is federally funded. _____ Initial | | | | |
| NIH Other Support Training | When NIH Other Support Training requirements apply; we confirm our Institution has a written and enforceable training policy. _____ Initial N/A | | | | |
| Responsible Conduct of Research (RCR) | If the project will be funded by the National Science Foundation (NSF), the U.S. Department of Agriculture National Institute of Food and Agriculture (USDA-NIFA), or the National Institutes of Health (NIH), as applicable, we affirm that we maintain an Institutional Responsible Conduct of Research (RCR) plan in compliance with agency requirements. We certify that a formal RCR training program is in place and that all project participants will complete RCR training consistent with the requirements of the applicable funding agency. _____ Initial N/A | | | | |
| Research Security Training | If the project is funded by the National Science Foundation (NSF), the U.S. Department of Agriculture (USDA), or the National Institutes of Health (NIH), Department of Energy (DOE), NASA, as applicable, we confirm all covered individuals have completed the training in accordance with the requirements. _____ Initial N/A | | | | |
| Export Controls | Subrecipient certifies compliance. The Subrecipient organization certifies that its export control officer or other authorized official has reviewed the proposal for compliance with federal Export Control laws. <i>(If applicable, explain any potential issues in the comment section below.)</i> The subrecipient is responsible for maintaining compliance with all federal export laws and procedures. _____ Initial | | | | |
| Financial Conflict of Interest (FCOI) | _____ No actual or potential FCOI identified. _____ FCOI identified. If awarded, no project work will begin until an FCOI management plan is approved by the Subrecipient organization and USU. <i>(Please indicate the nature of the FCOI in the comment section below.)</i> | | | | |
| Non-financial Conflict of Interest (COI) | Subrecipient agrees to disclose any other relationships or roles that could reasonably appear to affect the objectivity of the work, if known. (If applicable, disclose in the comments below.) _____ Initial | | | | |



| FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT (FFATA) <i>(Complete for federally funded projects only)</i> | | |
|--|-----|----|
| In the preceding fiscal year, did the Subrecipient organization receive 80% or more of its annual gross revenue from the federal government AND did those revenues total \$25 million or more annually? | Yes | No |
| Does the public have access to information about the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78(d)) or section 6104 of the Internal Revenue Code of 1986 (26 USC 6104)? | Yes | No |
| If you answered "Yes" to 1 and "No" to 2, please attach a list of the five most highly compensated officers of the Subrecipient organization. "Total compensation" means the cash and noncash dollar value earned by the executive during the Subrecipient's past fiscal year (for more information, see 17 CFR § 229.402 Ch. II). | | |
| OTHERWISE: Check this box indicating that Subrecipient organization is exempt from reporting Executive Compensation | | |
| F&A Rates (Check one) | | |
| Facilities and Administrative Rates included in this proposal have been calculated based on the following: | | |
| Our federally negotiated F&A rate for this type of work (attach a copy) or URL: | | |
| We do not have a federally negotiated rate and we hereby agree to accept the 15% de minimis MTDC rate as a subrecipient. in accordance with 2 CFR 200.414(f), unless a lower rate is required by the prime sponsor or pass-through entity | | |
| Fringe Benefit Rates (Check one) | | |
| Fringe Benefit Rates included in this proposal have been calculated based on the following: URL: | | |
| We do not have a federally negotiated rate and have applied actual fringe benefits (attach details) | | |
| Audit Status | | |
| Was the Subrecipient required to conduct an annual audit in accordance with the Single Audit Act or Uniform Guidance Subpart F audit requirements for the most recent Audit year? | Yes | No |
| If yes, a complete copy of the Subrecipient's most recent audit report or the URL to a complete copy must be furnished to Utah State before a subaward will be issued. URL: | | |
| Was an audit in accordance with the Single Audit Act completed for the most recent fiscal year? | Yes | No |
| Were there any audit findings reported? If yes, please provide details in the comments section below. | Yes | No |
| If no audit was completed OR the Subrecipient is not subject to the Single Audit Act or Uniform Guidance section (2 CFR 200.501) the Financial Status Questionnaire and potentially a limited scope audit will be required before a subaward is issued. | | |
| Subrecipient Organizational Information <i>(Federal policy requires Subrecipients of federal funds to be registered in SAM.gov)</i> | | |
| Is Subrecipient currently registered in the System for Award Management (www.sam.gov)? If NO, the Subrecipient must obtain a UEI through SAM.gov before the proposal can be submitted to the sponsor. Registration must remain active throughout the project period. | Yes | No |
| Debarment and Suspension | | |
| Is the Subrecipient organization, Principal Investigator (PI), or any other employee or student participating on this project debarred, suspended, or otherwise excluded from or ineligible for participation in federal department, agency, assistance programs or activities? | Yes | No |



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|--|--|--------------------------|------------------------------------|
| Is the Subrecipient organization presently indicted for, or otherwise criminally or civilly charged by a government entity? | | Yes | No |
| Federal Debts | | | |
| Is the Subrecipient organization delinquent on repayment of any federal debt including direct and guaranteed loans and/or other debt as defined in 2 CFR Part 200; §200.302 Financial management and §200.303 Internal controls? | | Yes | No |
| Prior Award Experience | | | |
| Is the Subrecipient organization currently in receipt of federal funding or has it received federal funding in the past? | | Yes | No |
| Has the Subrecipient organization had a contract, grant, and/or agreement terminated for cause or material breach? <i>(If "Yes," explain in the comment section below.)</i> | | Yes | No |
| Small Business Concern | | | |
| Subrecipient represents that it is a small business concern as defined in 13 CFR 124.1002 If yes, Subrecipient represents that it is a: (If Yes, check all that apply) | | Yes | No |
| <input type="checkbox"/> | Small disadvantaged business as certified by the Small Business Administration | <input type="checkbox"/> | HUBZone small business concern |
| <input type="checkbox"/> | Veteran-owned small business concern | <input type="checkbox"/> | Women-owned small business concern |
| <input type="checkbox"/> | Service-disabled veteran-owned small business concern | <input type="checkbox"/> | |
| Institutional Certifications (Choose one) | | | |
| Financial Conflict of Interest (FCOI) (Unless this section is not applicable, Subaward will not be issued to Subrecipient without a sponsor-compliant policy.) | | | |
| <input type="checkbox"/> | Subrecipient Organization/Institution 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" and 45 CFR Part 94 "Responsible Prospective Contractors." Subrecipient also certifies that, to the best of 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 expenditures of any funds under any resultant agreement and within a timely manner sufficient to enable timely FCOI reporting. | | |
| <input type="checkbox"/> | Subrecipient does not have an active and/or enforced conflict of interest policy but certifies that it will develop a policy that is compliant with federal Financial Conflict of Interest requirements prior to receiving an award. The Federal Demonstration Partnership (FDP) has developed a model Financial Conflicts of Interest Policy to assist potential Subrecipient Institutions that do not have a policy or disclosure form in place. Subrecipient entities without an approved FCOI Policy can use this model template to create their own FCOI policy and disclosure form. The Model Policy can be found at https://thefdp.org/demonstrations-resources/fcoi-clearinghouse/ Subrecipient will provide a copy of their FCOI policy or the URL link to the policy at the time of award. | | |
| <input type="checkbox"/> | Subrecipient does not have an active and/or enforced conflict of interest policy and hereby agrees to abide by Utah State's policy, located at https://www.usu.edu/policies/545/ . At award, Utah State's Research Integrity Office will contact Subrecipient to obtain disclosures. | | |
| By signing below, the Subrecipient certifies that the required COI training will be completed by each Investigator and key personnel prior to engaging in any research related to a PHS or DOE funded award. | | | |



Comments: (If more room is needed, please attach answers)

By signing below and agreeing to participate in this sponsored project, the Subrecipient Institution certifies that neither the Institution nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in federally funded programs, and that they are not delinquent on any federal debt. The Subrecipient further certifies compliance with the Drug-Free Workplace Act of 1988; U.S. Code, Section 1352 restrictions on the use of federal funds for lobbying; and applicable requirements related to research integrity and misconduct in science.

The Subrecipient also affirms compliance with federal nondiscrimination requirements, including those related to civil rights, disability, sex discrimination, and age discrimination, and with Public Health Service policies governing program income. Additionally, the Subrecipient maintains policies and procedures in compliance with 45 CFR Part 46, Subpart A (Protection of Human Subjects), the Animal Welfare Act (Public Law 89-544, as amended), and applicable regulations governing biomedical and research activities, including those related to recombinant DNA, human gene transfer, fetal tissue transplantation, and the inclusion of women, minorities, and children in research, as applicable.

The Subrecipient’s programmatic and administrative personnel involved in this application acknowledge and agree to comply with the prime awarding agency’s policies, terms, and conditions. The Subrecipient further agrees to enter into a formal subaward agreement, if awarded, consistent with those requirements. Any terms or rates included in this proposal are not binding upon the Pass-Through Entity; all final terms and conditions will be set forth in a separate, fully executed agreement. The Subrecipient acknowledges that any work performed or costs incurred prior to execution of such an agreement are undertaken at its own risk.

I certify, to the best of my knowledge and belief, that the information provided herein is true, complete, and accurate. I understand that the submission of false, fictitious, or fraudulent information, or the omission of any material fact, may result in criminal, civil, or administrative penalties, including those outlined under U.S. Code Title 18, Sections 2, 1001, and 1343, and Title 31, Sections 3729–3730 and 3801–3812.

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| <i>Subrecipient’s Authorized Institutional Official</i> | <i>Name and Title</i> | <i>Date</i> |