

Subrecipient Determination Form (02-25-16)

Northeastern PI:

Department/College:

Name of Entity:

Proposal Title and/or Coeus Dev. Prop. #:

Before entering into a formal agreement with another entity for goods, services, or substantive work under a sponsored award to Northeastern University, a determination must be made regarding the nature of the entity's legal relationship with Northeastern University. This form may be used as a tool to discern whether the characteristics of this legal relationship are indicative of a subrecipient or of a contractor classification. **Characteristics which support the classification as subrecipient are (check all that apply):**

- The entity will be engaged to perform substantive, programmatic work (e.g. an important or significant portion of the research program or project.)
- The entity participates in designing and/or conducting the work.
- The entity has some element of responsibility for making programmatic decisions.
- The entity's personnel are identified as having a key role in Northeastern's proposal.
- The entity may seek to publish or co-author the results.
- The entity may provide cost sharing and may sub out some of its work.
- The entity has responsibility for compliance with Federal program requirements.
- The entity's performance is measured against whether or not the objectives of the sponsored program have been achieved.
- Funds will be used to carry out a sponsored program assigned to the entity, rather than provide goods or service to Northeastern.

Characteristics which support the classification as contractor are (check all that apply):

- The entity provides goods and services in the normal operations and markets these to a variety of customers (creating a procurement relationship).
- The entity is providing specified services in support of or ancillary to the research program or project.
- The entity operates in a competitive environment.
- The entity has little or no independent decision making in the design or conduct of the work being completed.
- The entity has not participated significantly in the design of the work.
- The entity is not directly responsible for determining research or project results.
- The entity would not seek to publish or co-author results.

In making the determination of whether a Subrecipient or contractor relationship exists, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases therefore Northeastern University must use judgment in classifying each agreement as a subaward or a procurement contract.

Explanation of use of judgment determination:

Final Determination: Subrecipient Contractor

PI Signature:

Date: