



*Purpose: This form should be completed to determine if an entity potentially receiving federal funds from a Lewis & Clark College sponsored project should be a subrecipient or a contractor (reference 2 CFR §200.330).*

**1**

Project Information				
PI/PD First Last Name	Department	School	Sponsor	
Project Title			Project Start Date	Project End Date

**2**

Subrecipient Information			
Provider Organization Name	Type of Entity	Website Address, if available	Contact First Last Name
Description of Services to be Provided			

**3**

Characteristics of Subrecipient or Contractor Relationship (Check all that apply to the external entity)			
<p><b>Subrecipient:</b> A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient.</p> <ol style="list-style-type: none"> <li>Will their performance represent an intellectually significant portion of the overall programmatic effort and be measured against the objectives of the program?</li> <li>Will their funds be used to carry out a program for a public purpose, as opposed to providing goods or services for the benefit of LC?</li> <li>Will their PI perform investigator-level work?</li> <li>Will they be responsible for adherence to compliance requirements, including the Federal program requirements specified in the award?</li> <li>Are they likely to publish their results and/or co-author publications with the Michigan Tech PI?</li> <li>Will the Lewis &amp; Clark PI need to oversee their involvement in the project and verify satisfactory performance before payment is made?</li> </ol> <p><b>Contractor:</b> A contract is for the purpose of obtaining goods and services for the non-federal entity's own use and creates a procurement relationship with the contractor</p> <ol style="list-style-type: none"> <li>Do they provide the goods and services within normal business operations (goods and services are not specialized for this project)?</li> <li>Do they provide similar goods or services to many different purchasers?</li> <li>Do they normally operate in a competitive environment?</li> <li>Will they perform a series of repetitive tests or activities requiring little or no discretionary judgment?</li> <li>Will they be exempt from compliance requirements of the Federal program and/or award as a result of the agreement?</li> <li>Will they <u>not</u> have responsibility for programmatic decision making?</li> </ol> <p><b>Use of Judgment:</b> (use only when the determination cannot clearly be made answering the questions above)</p>			
<table border="1"> <tr> <td>PI/PD First Last Name:</td> <td>Signature:</td> <td>Date:</td> </tr> </table>	PI/PD First Last Name:	Signature:	Date:
PI/PD First Last Name:	Signature:	Date:	

**4**

Final Determination to be completed by SPARC: Subrecipient Contractor		
Approver First Last Name:	Signature:	Date: