



## **FAQ’S FOR UNIFORM GUIDANCE**

### **Subrecipient/Contractor Determinations (§200.330)**

In accordance with Uniform Guidance (UG) §200.330, Fred Hutch must make case-by-case determinations whether an entity or individual to whom Fred Hutch will disburse Federal Program funds meets the definition of a Subrecipient or a Contractor as defined by UG. This determination should be based on the nature of the activities to be performed by the entity. The Subrecipient Determination Form should be used to facilitate and document the analysis supporting appropriate entity determinations in accordance with UG §200.330 for the disbursement of funds. The UG Team provides the following Frequently Asked Questions (FAQs) to clarify use of this Form:

<p><b>Q: <i>If I have a new Subaward in year 2 (noncompeting year) of an NIH Award, do I need to complete an SDF?</i></b></p> <p><b>A:</b> Yes.</p>
<p><b>Q: <i>How do I complete the SDF for the above situation?</i></b></p> <p><b>A:</b> It depends.....</p> <ul style="list-style-type: none"> <li>• If it is at the proposal stage (noncompetitive or competitive), check the appropriate box on Attachment A.</li> <li>• If it is at any point outside of a proposal submission, check the appropriate box on the SAF.</li> </ul>
<p><b>Q: <i>What if I had already completed an SDF in Year 1 for the above situation? Do I need to complete one in Year 2?</i></b></p> <p><b>A:</b> It depends.....</p> <ul style="list-style-type: none"> <li>• If the relationship has not changed based on activities to be performed, then No.</li> <li>• If there is a change in the relationship, e.g., Consultant to Subrecipient, then Yes.</li> </ul>
<p><b>Q: <i>If I have a new Purchased Services Entity in year 2 (noncompeting year) of an NIH Award, do I need to complete an SDF?</i></b></p> <p><b>A:</b> Yes.</p>
<p><b>Q: <i>How do I complete the SDF for the above situation?</i></b></p> <p><b>A:</b> It depends.....</p> <ul style="list-style-type: none"> <li>• If it is at the proposal stage (noncompetitive or competitive), check the appropriate box on Attachment A.</li> <li>• If it is at any point outside of a proposal submission, _____.</li> </ul>
<p><b>Q: <i>Who needs to ensure that the person signing the SDF has direct knowledge of the activities for the entity/entities identified and has appropriate authorizations?</i></b></p> <p><b>A:</b> PI/Department.</p>
<p><b>Q: <i>Who needs to keep the SDF for their records?</i></b></p> <p><b>A:</b> PI/Department.</p>



**Q:** *When does the requirement to complete SDF's begin?*

**A:** The target date for implementation is July 1, 2015 as audit requirements go into effect for FY 2016.

**Q:** *Does this mean I have to complete an SDF for all applicable transactions after the target implementation date of July 1, 2015?*

**A:** Yes, because this is a new requirement and no SDF's existed prior to this date, SDF's are required for all circumstances in which they apply beginning on our target date of July 1, 2015.