

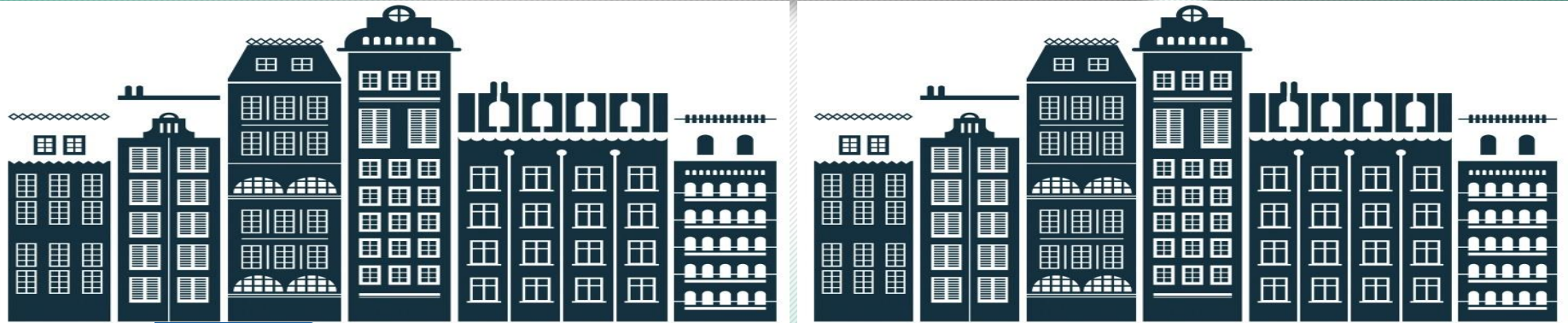
U.S. Department of Housing and Urban Development (HUD)
Office of Lead Hazard Control and Healthy Homes (OLHCHH)

FY2021 NEW GRANTEE ORIENTATION

Grant Administration: Determining Match, Subrecipients, and Contractors

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VIRTUAL CONFERENCE, MAY 3- MAY 14, 2021

Objectives

- Understand the Importance of Grant Match Requirement
- Determine the Appropriate Subrecipients and Contractors
- Grasp the Difference between Subrecipients and Contractors

Match Overview

2CFR 200. 306 Subpart D - Cost Sharing or Matching

- For all federal awards, any shared costs (matching funds) and all contributions must be accepted as part of grantee match if it meets the following criteria:
 - 1) Are verifiable from the non-federal entity's records;
 - 2) Are not included as contributions for any other federal award;
 - 3) Are necessary and reasonable for accomplishment of project or program objectives;
 - 4) Are allowable under Subpart E- Cost Principles;
 - 5) Are not paid by the Federal Government under another Federal award, **except** where the Federal statute authorizing a program specifically provides that federal funds made available for such program can be applied to matching or cost sharing requirements of other Federal programs;
 - 6) Are provided in the approved budget for the grant; and
 - 7) Comply with other conditions within the matching regulations subpart.

Match Overview

2CFR 200. 306 Subpart D - Cost Sharing or Matching

Types of Match

- Unrecovered indirect costs
- Non-federal public or private funds
- Funds that are not used as match for any other federal program (except when allowable)
- Either cash or in-kind contributions

Match Overview

2CFR 200. 306 Subpart D - Cost Sharing or Matching

Documenting Match

- Match Letters
 - Name of match Source
 - Amount of match
 - Types of match (cash or in-kind)
 - Description and purpose of eligible program activities as a result of match
 - Documentation to prove match from matching organization

Match Overview

2CFR 200. 306 Subpart D - Cost Sharing or Matching

Documenting Match

- Cash Contributions verified by:
 - General ledger entries
 - Expenditure reports
 - Invoices
 - Signed contracts/ agreement
 - Timesheets,
 - Activity reports, etc.

Match Overview

2CFR 200. 306 Subpart D - Cost Sharing or Matching

Documenting Match

- In-Kind (including third-party contributions) verified by:
 - Identification of donated equipment, supplies, volunteers' services, etc.
 - Fair Market Determinations
 - Invoices
 - Timesheets and/or activity reports, etc.

Subrecipient Overview

Subrecipients

- A non-Federal entity that receives a subaward from a passthrough entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.
- Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity

Subrecipient Overview

Subrecipients

- OLHCHH may recognize other organizations as a subrecipient, such as an organization that provides public services (i.e., local government agencies, community based, faith-based organizations, and nonprofit foundations)

Contractor Overview

Contractors

- means an entity that receives a contract as defined in § 200.23.
- Characteristics of a procured relationship between the non-Federal entity and a contractor are when the contractor:
 - 1) Provides the goods and services within normal business operations;
 - 2) Provides similar goods or services to many different purchasers;
 - 3) Normally operates in a competitive environment;
 - 4) Provides goods or services that are ancillary to the operation of the Federal program; and
 - 5) Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

Subrecipients vs Contractors

Determining Subrecipients vs Contractors

- Grantee must complete the, “Checklist to Determine Subrecipient or Contractor Classification OLHCHH” for each subrecipient or contractor receiving funds greater than \$10,000.

Subrecipient / Contractor Classification	New Subrecipient / Contractor Classification
No records to display	

- The Federal Finance Assistance Accountability and Transparency Act of 2006 (FFATA) requires awardees receiving funds directly from HUD to report information for their subawards over \$25,000. <https://www.fsrs.gov/>
- All partners or partnerships will be classified as being either a subrecipient or a contractor. An entity cannot serve as both a subrecipient and contractor under the same grant.
- All subrecipients or contractors shall be registered in the System for Award Management (SAM) website: www.sam.gov

Subrecipients vs Contractors

**CHECKLIST FOR DETERMINING
SUBRECIPIENT OR CONTRACTOR CLASSIFICATION
UNDER AN OLHCHH GRANT OR COOPERATIVE AGREEMENT**

INSTRUCTIONS: Complete sections one and two of the checklist by marking all characteristics that apply to the entity being classified as a subrecipient (subgrantee) or as a contractor (vendor). The entity is prohibited from receiving both a contract and a subgrant for the same grant or cooperative agreement. Additional information can be provided in the comment section.

NAME: _____ EIN/TIN: _____ DUNS No: _____
Name of Entity

SECTION ONE - SUBRECIPIENT

CHECK ALL APPROPRIATE BOXES

- 1. Determines who is eligible to receive Federal assistance.
- 2. Commercial and Government Entity (CAGE) Code is listed as U.S. Local Government (City, County, State, or Federal Recognized Tribal Government).
- 3. Has its performance measured in relation to whether objectives of a Federal program are met.
- 4. Provides public service for local U.S. government (See SAM) to people living within its jurisdiction, either directly (through the public sector) or by financing provision of services, for example, a hospital or non-profit organization with no fee/profit. If a non-profit organization has proposed a fee/profit or overhead cost, it **shall be categorized** as a contractor, move to Section Two - Contractor).
- 5. Has responsibility for programmatic decision making.
- 6. Is responsible for adherence to applicable Federal program requirements specified in the Federal award, and in accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.
- 7. This section is not applicable to the above entity.

Comments:

SECTION TWO - CONTRACTOR

CHECK ALL APPROPRIATE BOXES

- 1. Provides the goods and services within normal business operations;
- 2. A non-profit organization or a profit organization that proposes a fee/profit or overhead cost;
- 3. Provides similar goods or services to many different purchasers;
- 4. Normally operates in a competitive environment;
- 5. Provides goods or services that are ancillary to the operation of the Federal program, and
- 6. Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

Comments:

PRIME RECIPIENT INFORMATION

Grant Cooperative Agreement Number: _____

Grant Cooperative Agreement: _____
(Recipient Name from the Application for Federal Assistance (Form SF424, block 8a))

Program Manager/Principal Investigator: _____
(Print Name and Title)

SECTION THREE - DETERMINATION OF CLASSIFICATION AND THRESHOLD REVIEW

_____ is classified by Prime Recipient as a Subrecipient or Contractor for
Entity's Name
Grant Cooperative Agreement Number: _____

Grant (Threshold Review Processing)		Contract *Federal Awardee Performance and Integrity Information System (Report of Contract Findings; with the Federal Government)	
**Excluded Party List	yes <input type="checkbox"/> no <input type="checkbox"/>	Administrative Agreement	yes <input type="checkbox"/> no <input type="checkbox"/>
**Federal Delinquent Debt	yes <input type="checkbox"/> no <input type="checkbox"/>	Defective Pricing	yes <input type="checkbox"/> no <input type="checkbox"/>
**CAGE Code /Active CCR	yes <input type="checkbox"/> no <input type="checkbox"/>	DoD Determination of Contractor Fault	yes <input type="checkbox"/> no <input type="checkbox"/>
***Federal Audit Clearinghouse	yes <input type="checkbox"/> no <input type="checkbox"/>	Information on Trafficking in Persons	yes <input type="checkbox"/> no <input type="checkbox"/>
		Non-Responsibility Determination	yes <input type="checkbox"/> no <input type="checkbox"/>
		Recipient Not-Qualified Determination	yes <input type="checkbox"/> no <input type="checkbox"/>
		Subcontractor Payment Issues	yes <input type="checkbox"/> no <input type="checkbox"/>
		Termination for Cause	yes <input type="checkbox"/> no <input type="checkbox"/>
		Termination for Default	yes <input type="checkbox"/> no <input type="checkbox"/>
		Termination for Material Failure to Comply	yes <input type="checkbox"/> no <input type="checkbox"/>

Approve

Determination for Classification:

Procurement Officer (Print Name) _____ Procurement Officer Signature _____ Date _____

Project Director (Print Name) _____ Project Director Signature _____ Date _____

PLEASE RETAIN FOR YOUR RECORDS ONLY

Subrecipient / Contractor Classification New Subrecipient / Contractor Classification

No records to display

Submit completed forms here

Important Reminders

- Be sure to follow local procurement standards for entering into contractual agreements with subrecipients and contractors
- Evaluate capacity and potential effectiveness of subrecipient and contractor relationship with the goal of program success in mind
- Complete the Contractor and Subrecipient Checklist and submit via Healthy Homes Grant Management System (HHGMS)
- Adhere to your match requirements for your Lead Hazard Control grant
- Consult with your GTR if you have any issues or concerns related to your grant award

Policy References

2CFR 200. 306 Subpart D - Cost Sharing or Matching

2 CFR 200. 331 Subrecipient and contractor determinations

Policy Guidance (PG) 2019-01 Determining Subrecipient or Contractor Classification

<https://www.hud.gov/sites/dfiles/HH/documents/PGI%202019-01.pdf>

Checklist for Determining Subrecipient or Contractor Classification (found under PG 2019-01)

Questions

