

# Subrecipient and Contractor Determination Sheet\*



## Introduction:

The non-Federal entity (the supplier) may concurrently receive awards as a direct recipient, a subrecipient, and a contractor, depending on the substance of its agreements with Federal and State awarding agencies and pass-through entities. Therefore, the pass-through entity (the City of Minneapolis), must make case-by-case determinations whether each agreement it makes casts the party receiving the funds in the role of a subrecipient or a contractor. Fill out the section below for guidance in this determination. Keep this completed determination form with the agreement or contract.

<b>Supplier Name/Number:</b>	
<b>Funding Source:</b>	

## Subrecipient vs Contractor Characteristics:

(Place an "x" in the box that best answers the questions either in the column under Subrecipient or Contractor, but not both. If unknown, leave blank.)

Subrecipient		Contractor		
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	1. Does the supplier determine who is eligible to receive Federal or State assistance?
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	2. Is the supplier's performance measured in relation to whether Federal or State program objectives were met?
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	3. Does the supplier have responsibility for programmatic decision making?
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	4. Is the Supplier responsible for compliance requirements of the grant award?
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	5. Is the supplier providing goods or services to carry out a program for a public purpose specified in the authorizing statute?
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	6. Is the supplier providing goods or services for the benefit of the City of Minneapolis as an entity?
No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	7. Does the supplier provide these goods or services within their normal business operations?
No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	8. Does the supplier provide similar goods or services to many different purchasers?
No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	9. Does the supplier normally provide goods or services in a competitive environment?
No	<input type="checkbox"/>	Yes	<input type="checkbox"/>	10. Are goods or services provided by the supplier supplementary to the main objective of the Federal (or State/local) program, rather than for the main objective itself? (If this is a federal award, look up the CFDA # in <a href="https://beta.sam.gov/">https://beta.sam.gov/</a> to see its objective.)
Subrecipient		Contractor		
				<b>Total the number of X's in each column (at left).</b> (Use totals to help determine if this agreement is Subrecipient or Contractual in nature.)

<h3 style="margin: 0;">Determination:</h3> <p style="margin: 0;">(Place X in box for selection →)</p>	Subrecipient <input style="width: 40px; height: 25px;" type="checkbox"/>	Contractor <input style="width: 40px; height: 25px;" type="checkbox"/>
---	--	--

Judgment must be used in this classification. In determining whether an agreement casts the supplier as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All the characteristics listed above may not decidedly be one or the other, there may be some characteristics of both present. Use your best judgement.

### Reason for supporting this Determination:

<b>Person Making Determination:</b>		<b>Date:</b>	
When award is finalized add <b>COMET Contract Number (include FAN if applicable):</b>		<b>C-</b>	

\*Based on Uniform Guidance 2 CFR Part 200 Section 220.330