Cornell Research&Innovation

Cornell University
Office of Sponsored Programs
373 Pine Tree Road, Ithaca, NY 14850

SUBRECIPIENT COMMITMENT FORM

PART I: TO BE COMPLETED BY ALL PARTICIPANTS - All Subrecipients must complete this form when participating in a Cornell project. This form must be signed by an authorized official/institutional representative (AOR), or individual with the legal authority to sign on behalf or the Subrecipient organizaiton.

ORIGINATING (PRIME) SPONSOR INFORMATION					
Prime Sponsor Name					
Cornell PI					
Project Title					
SUBRECIPIENT INSTITUTION INFORMATION					
Institution			**UEI**	**EIN**	
If FDP Expanded Clearinghouse participant provide profile URL					
PI Name					
PI Email					
Project Period					
Performance Site Address				**Performance Site Congressional District**	
Direct Costs		**IDC**		**Total Costs**	
Cost Share (Include Amnt. & Justification in Budget)	**Yes** ◯ **No** ◯	**Amount**			
SUBRECIPIENT CONTACTS					
Administrative			**Email**		
			Phone		
Authorized Official			**Email**		
			Phone		

PROPOSAL DOCUMENTS (*REQUIRED FOR ALL PROPOSALS)

✔	**SUB. COMMITMENT FORM**	☐	**Small/Small Disadvantaged Business Subcontracting Plan**
✔	**BUDGET & JUSTIFICATION**	☐	**Key Personnel Biosketches**
✔	**STATEMENT OF WORK**	☐	**KP Current & Pending Support**
			Other:

COMPLIANCES	**YES/NO**	**APPROVAL DATE OR PENDING**		**YES/NO**	**APPROVAL DATE OR PENDING**
Human Subjects	Choose		**Select Agents**	Choose	
Vertebrate Animals	Choose		**Recombinant DNA**	Choose	
Human Embryonic Stem Cells	Choose		**Program Income**	Choose	

CERTIFICATIONS

If this project receives funding from the US Federal Government at any level, the Subrecipient Institution certifies that:

- It has implemented a research security training program as required by NSPM-33 and the CHIPS and Science Act of 2022, and that all named Senior/Key Personnel have taken and will renew said training annually as required by the Prime Sponsor.
- All individuals identified as senior/key personnel have been made aware of their responsibility under both the NDAA for Fiscal Year 2021 and the CHIPS and Science Act of 2022, and have certified they are not a party to a Malign Foreign Talent Recruitment Program.

This proposal has been reviewed and approved by the appropriate official(s) of the Subrecipient and certified to its accuracy and completeness. The appropriate programmatic and administrative personnel of Subrecipient involved in this application are aware of the prime awarding agency's policies, agree to accept the obligation to comply with award terms, conditions, and certifications, and are prepared to establish the necessary inter-institutional agreement consistent with that policy.

Any terms or rates included in the proposal described herein are not binding upon the Pass-Through Entity. All terms and conditions between the parties will be outlined in a separate formal agreement. Any work begun and/or expenses incurred prior to the execution of a subaward agreement are at the Subrecipient's own risk.

SUBRECIPIENT INSTITUTIONAL OFFICIAL:

Name and Title	Signature / Date

Entities who are not members of the FDP Expanded Clearinghouse (https://fdpclearinghouse.org/) as of the date this document is signed are required to complete additional information in Part II of this form. Please note that the signature above confirms the accuracy and completeness of the information provided by your entity in the latter part of this document as well.

PART II: TO BE COMPLETED BY NON-FDP EXPANDED CLEARNING HOUSE PARTICIPANTS *[https://fdpclearinghouse.org]*

A. Indirect Cost Rates (IDC) and Base | Rates included in this proposal have been calculated based on:

- ◯ Our federally negotiated indirect cost (IDC) rates and base for this work applies. **(If this box is checked, a copy of or link to your IDC rate agreement is required.)**
- ◯ The sponsor imposed IDC rate of _____ % of _____ base
- ◯ De minimis rate of 15% Modified Total Direct Costs consistent with 2 CFR 200.414(f)
- ◯ De minimis rate of 10% Modified Total Direct Costs for NIH consistent with NOT-OD-26-072
- ◯ Other rates or base as described in Section H.

B. Fringe Benefit Rates (FB) | Rates included in this proposal have been calculated based on:

- ◯ Our federally-negotiated Fringe Benefit (FB) rates for this type of work. **(If this box is checked, a copy of or link to your FB rate agreement is required.)**
- ◯ Other rates as described in Section H.

C. Small Business Concern: Yes ◯ **No** ◯ **If "No," skip to section D.**

If "Yes," Subrecipient represents that it is a small business concern as defined in 13 CFR 124.1002 and represents it is a:

- ☐ Small disadvantaged business as certified by the Small Business Administration
- ☐ Woman-owned small buisness concern
- ☐ Veteran-owned small business concern
- ☐ Service-disabled veteran-owned small business concern
- ☐ HUBZone small business concern

D. Conflict of Interest

- ◯ Subrecipient does not have an active and/or enforced conflict of interest policy and wishes to comply with Cornell's Financial Conflict of Interest Policy. *[https://policy.cornell.edu/policy-library/research-related-conflicts-interest-and-commitment]*
- ◯ Subrecipient has an active and enforced Conflict of Interest Policy.
- ◯ Subrecipient confirms that its Conflict of Interest Policy is consistent with the Conflict of Interest Policy of the Prime Sponsor.

E. Audit Status

- ◯ Subrecipient receives an annual audit in accordance with 2 CFR Part 200 - Subpart F - Audit Requirements*

Most recent FY completed: _____ Choose Audit findings were reported (If "Yes," explain in Section H. Comments below)

Please attach a copy of or provide a link to your most recent audit report

- ◯ Subrecipient **DOES NOT** receive an annual audit in accordance with 2 CFR Part 200 - Subpart F - Audit Requirements**

*****If awarded, Subrecipient will be required to provide a copy of its most recent audited organizational financial statements***

Subrecipient is a:
- ◯ Non-profit entity (under federal funding threshold)
- ◯ For-profit entity
- ◯ U.S. Government entity
- ◯ Foreign entitty

F. Fiscal Responsibility

Subrecipient certifies that its financial system is in accordance with generally accepted accounting priciples, and has the ability to:

- ☐ Identify, in its accounts, all federal awards received and expended and the federal programs under which they were received.
- ☐ Identify direct costs from indirect costs;
- ☐ Can prepare appropriate invoices, financial statements, including the schedule of expenditures of federal awards;
- ☐ Maintains internal controls to assure it is managing federal awards in compliance with applicable laws, regulations, and the provision of terms and conditions of grants or contracts;
- ☐ Maintains personnel effort reports that support the distribution of salaries and wages to the funded project and account for the employee's total effort;

G. Debarment and Suspension

◯ Yes	◯ No	Is the PI or any other employee or student participating in this project debarred, suspended, or otherwise excluded from or ineligible for participation in federal assistance programs or activities?

The Subrecipient certifies it: (answer all questions below)

◯ is	◯ is not	presently debarred, suspended, proposed for debarment, or declared ineligible for award of federal grants/contracts
◯ is	◯ is not	presently indicted for, or otherwise criminally or civilly charged by a government entity
◯ has	◯ has not	within three (3) years preceding this offer, been convicted of or had a civil judgement rendered against them for commission of fraud or criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) contract or subcontract; violation of federal or state antitrust statutes relating to the submission of offers; or commission of embezzlement, theft, forgery, bribery, falsificaion or destruction of records, making false statements or receiving stolen property
◯ has	◯ has not	within three (3) years preceding this offer, had one or more contracts terminated for default by any federal agency

H. Comments

I. Next Steps to anticipate if grant/contract is awarded (as applicable):

- As required by UG 2 CFR 200.331 and Cornell's internal policy, Subrecipient must provide monitoring documentation before the subaward or subcontract can be issued. This includes a financial audit or financial statements, proof of insurance, a profile questionnaire provided by Cornell University, and a negotiated indirect cost rate (IDC) agreement.
- Approved IACUC and/or IRB protocols (or Ethics Committee Approvals) may be required.
- For federal grants/contracts, subrecipient will be required to obtain a Unique Entity Identifier (UEI)