

## Notification to Subaward Recipients

Dear University of Alabama Partner,

You are receiving this Notification because your entity has been identified as a potential Subaward Recipient under a proposed University of Alabama sponsored project. The following is provided to inform you of the requirements for participating as a Subaward Recipient. Compliance is not expected until the University has an award (prime award) and is ready to issue a Subaward. You should, however, be aware of these requirements to expedite that process.

If the University receives a prime award and you become a Subaward Recipient, you will be asked to comply with the following requirements, as applicable.

- Certification of a Financial Conflict of Interest (FCOI) policy compliant with Public Health Service (PHS) requirements or agreement to follow the FCOI policy of The University of Alabama (<http://osp.ua.edu/site/FCOI%20Policy.pdf>). Entities with a PHS compliant FCOI policy are strongly encouraged to certify through the Federal Demonstration Partnership FCOI Clearinghouse, [http://sites.nationalacademies.org/PGA/fdp/PGA\\_070596](http://sites.nationalacademies.org/PGA/fdp/PGA_070596).
- Flow-down provisions as required by the prime agreement and/or appropriate to the scope of work of the Subaward, such as compliance with requirements in place to ensure the rights and well-being of human and animal subjects, export control regulations, etc.
- Various reporting requirements as determined by the financial terms of the prime agreement and the Principal Investigator (ex: Technical Update every 60 days)

Additional requirements specific to Federal funds (both direct and pass-through).

- DUNS Number (also requested for non-federal)
- SAM registration information (also requested for non-federal)
- Entities not subject to the Single Audit, required in part F of 2 CFR 200 (Uniform Guidance), may be required to complete a Financial Risk Assessment Questionnaire.
- Budget/Financial restrictions
  - Unless further limited by the prime sponsor, the University will accept an entity's federally negotiated facilities and administrative (F&A or indirect) cost rate. If you have never had a federally negotiated F&A rate, the University is only allowed to reimburse your F&A costs at a 10% rate.
  - Non-profit entities are subject to the Cost Principles and Audit Requirements found in parts E and F of 2 CFR 200 (Uniform Guidance).
  - For-profit entities are subject to 48 CFR Part 31, Contract Cost Principles and Procedures. When the University's prime agreement is a grant or cooperative agreement, it cannot pay a fee or profit. These are also restricted under contracts.

If there are concerns regarding your ability to comply with any of the above, or you believe you are receiving this notice in error, please contact the [Office for Sponsored Programs](#) immediately to resolve any issues.