



Office of Sponsored Programs (OSP) SUBRECIPIENT COMMITMENT FORM

Subrecipient Legal Name: _____

Subrecipient Address: _____
Street: _____
City, State, Zip: _____

Subrecipient PI Name: _____

Subrecipient PI E-mail: _____ Phone: _____ Fax: _____

Sub. OSP Contact Name: _____

Sub. OSP E-mail: _____ Phone _____ Fax _____

Address where research will be performed (if different from above): _____
Street: _____
City, State, Zip: _____

Proposal Title: _____

Performance Period
Begin Date: _____ End Date: _____

CWM PI Name: _____ Pat Popp

Prime Sponsor: _____ US Dept of Education

UEI Number: _____ EIN/TIN _____

Registered in SAM.GOV: ☐ Yes ☐ No

SECTION A – Proposal Documents

The following documents are included in our proposal submission and covered by the certifications below (check as applicable):

☒ **STATEMENT OF WORK** (required) which includes:

- Specific work to be performed

☒ **BUDGET AND BUDGET JUSTIFICATION** (required)

SECTION B - Certifications

1. **Human Subjects** ☐ Yes ☐ No **Approval Date:** _____ **FWA#** _____

If "Yes": Copies of the IRB approval and approved "Informed Consent" form must be provided before any subaward will be issued. Please forward these documents to CWM's PI and CWM's OSP as soon as they become available.

If "Yes": Have all key personnel involved completed Human Subjects Training? ☐ Yes ☐ No

2. **Animal Subjects** ☐ Yes ☐ No **Approval Date:** _____ **AWA MPA*#** _____ *

If "Yes": A copy of the IACUC approval must be provided before any subaward will be issued. Please forward this document to CWM's PI and CWM's OSP as soon as it becomes available.

**Foreign entities receiving PHS funding as a result of any award made to William & Mary need to directly apply to the Office of Laboratory Animal Welfare for a Foreign Assurance.*

3. **Debarment and Suspension**

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? ☐ Yes ☐ No
(If "Yes", explain in Section D *Comments* below)

The Subrecipient certifies they: (answer all questions below)

<input type="checkbox"/> are	<input type="checkbox"/> are not	presently debarred, suspended, proposed for debarment, or declared ineligible for federal contracts
<input type="checkbox"/> are	<input type="checkbox"/> are not	presently indicted for, or otherwise criminally or civilly charged by a government entity
<input type="checkbox"/> have	<input type="checkbox"/> have not	within three (3) years preceding this offer, been convicted of or had a civil judgment rendered
		against them for commission of fraud or criminal offense in connection with obtaining, attempting to



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obtain, or performing a public (federal, state or local) contract of subcontract; violation of Federal or State antitrust statutes relating to the submission of offers; or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property

☐ have ☐ have not within three (3) years preceding this offer, had one or more contracts terminated for default by any federal agency

4. Potential Financial Conflict of Interest (applicable to PHS (includes NIH, NSF, etc.) or other sponsors that have adopted the federal financial disclosure requirements)

☐ Not applicable because this project is not being funded by PHS (includes NIH, NSF, etc.) or other sponsor that has adopted the federal financial disclosure requirements

☐ Applicable – please explain: _____.

5. Lobbying:

Part A: No Federal appropriated funds have been paid or will be paid, by or on behalf of the Subrecipient, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer of employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

Part B: Disclosure of lobbying is required pursuant to 31 USC 1352. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or intending to influence an officer of employee of any agency, a Member of Congress, an officer of employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the Subrecipient shall complete and submit Standard Form-LLL "Disclosure Form to Report Lobbying," to the Prime Recipient.

Part C: The Subrecipient shall require that the language of this certification be included in the award documents for all subawards and all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 21, US Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each failure.

☐ Subrecipient certifies that it will not use Federal or non-Federal funds to conduct lobbying activity

☐ Subrecipient certifies that it will not use Federal funds to conduct lobbying activity and discloses its non-Federally funded lobbying activity (Attach form SF-LLL)

☐ Not applicable because this proposal is in response to a non-US Government funding opportunity

SECTION C - Audit Status

6. Audit Status

☐ Subrecipient receives an annual audit in accordance with 2 CFR part 200.

Most recent fiscal year completed: FY _____

Were any audit findings reported? (If "Yes," explain below in Comments section) ☐ Yes ☐ No

☐ Subrecipient DOES NOT receive an annual audit in accordance with 2 CFR part 200.

Subrecipient is a:

- ☐ Non-profit entity (under federal funding threshold)
- ☐ Foreign entity
- ☐ For profit entity
- ☐ Government entity

Comments: _____



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Attach 3 most recent years of audited financial statements or paste URL to access publicly posted audited financial statements:

SECTION D - Budget

Budget Total: _____

SECTION E – Financial Controls

7. Past Performance

☐ Subrecipient has received either directly or as a lower-tier recipient prior US Government awards in the form of contracts, cooperative agreements, and/or grants

Briefly describe relevant prior support: _____

☐ Subrecipient has received either directly or as lower-tier recipient prior non-Federal awards in the form of contracts, cooperative agreements, and/or grants

Briefly describe relevant prior support: _____

☐ Subrecipient has no prior history of external support in the form of direct or pass-through contracts, cooperative agreements, and/or grants

8. Accounting System & Procedures

Risk Assessment Area	YES	NO	Documentation/Explanation
A) Does your organization have a computerized accounting system that can produce financial reports as well as track and report on funding by donor/source?	<input type="checkbox"/>	<input type="checkbox"/>	
B) Can your organization open a separate bank account for this award in order to track funds separately? If not, how are awards segregated?	<input type="checkbox"/>	<input type="checkbox"/>	
C) Does your organization employ financial staff that have knowledge of and the ability to implement USG (including USAID and/or Department of State) regulations? If not, describe training process to guarantee compliance.	<input type="checkbox"/>	<input type="checkbox"/>	
D) Does your organization have a written signatory / authority matrix?	<input type="checkbox"/>	<input type="checkbox"/>	
E) Does your organization segregate fiscal responsibility so that no one person may commit, incur, approve, and reconcile a given expense?	<input type="checkbox"/>	<input type="checkbox"/>	
F) Does your organization have a time-keeping system? Please describe.	<input type="checkbox"/>	<input type="checkbox"/>	
G) Does your organization have written policies and procedures for cost transfers and payroll	<input type="checkbox"/>	<input type="checkbox"/>	



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redistribution? If so, please provide. If not, explain.	<input type="checkbox"/>	<input type="checkbox"/>	
H) If your organization conducts work outside of the US, how are exchange rates managed? Does your financial system track expenses committed in foreign currency?	<input type="checkbox"/>	<input type="checkbox"/>	

APPROVED FOR SUBRECIPIENT

The information, certifications and representations above have been read, signed and made by an authorized official of the Subrecipient named herein. The appropriate programmatic and administrative personnel involved in this application are aware of agency policy in regard to subawards and are prepared to establish the necessary inter-institutional agreements consistent with those policies. **Any work begun and/or expenses incurred prior to execution of a subaward agreement are at the Subrecipient's own risk.**

Signature of Subrecipient's Authorized Official

Legal Name of Subrecipient's Organization/Institution

Name and Title of Authorized Official

Address

Email

City, State, Zip

Phone

Subrecipient's Congressional District

Date