With the issuance of the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* ("Uniform Guidance") [2 CFR Chapter 1, Chapter 2, Parts 200, 215, 220, 225 and 230] issued by the federal Office of Management and Budget (OMB) effective December 26, 2014, the University of Wisconsin-Extension (UWEX) Office of Extramural Support (OES) has implemented new procedures for risk assessment and monitoring of subrecipients in accordance with the new Uniform Guidance. These procedures are to be followed when engaging subrecipients on proposals (federal and non-federal sponsored projects) from UWEX including shared grant arrangements with other University of Wisconsin institutions. Estimated time to complete these steps may take up to two weeks depending on entity’s ability to provide a completed commitment form--please plan accordingly.

**PRIOR TO SUBMISSION OF ANY PROPOSAL**, project directors and their staff must complete the following steps:

1. Complete the “Subaward Questionnaire – Subrecipient or Contractor” [found at http://www.uwex.edu/business-services/forms/]. A guide to determine whether an entity should be considered a subrecipient or contractor can also be found at http://www.uwex.edu/business-services/forms/. (Further guidance can be found at §200.330 of the Uniform Guidance.)
2. Sign, date and upload a copy of the completed “Subaward Questionnaire – Subrecipient or Contractor” to the WISPER record.
3. If it is determined that the entity will serve as a subrecipient, send the “Subrecipient Commitment Form” (found at http://www.uwex.edu/business-services/forms/) to the entity for completion and return. This **MUST** be completed prior to proposal submission. If it is determined the entity will serve as a contractor, contact Procurement for proper form(s).
4. Prior to or upon receipt of the completed Subrecipient Commitment Form from the subrecipient, confirm subrecipient is not debarred or suspended by checking https://www.sam.gov/index.html/#1 (search by entering subrecipient DUNS number; legal name may also be used but may pull up multiple entities with similar name).
   a. If subrecipient is barred/suspended, go no further—they are not eligible to receive funding. The Project Director or his/her staff needs to communicate with the Subrecipient that UWEX cannot utilize them as a subrecipient.
   b. If subrecipient is not active in the SAM system, you may proceed to include them in the proposal. PD/designee must continue to work with the subrecipient to ensure completion of registration in the SAM system. If prime award is received from funding agency and subrecipient does not have an active registration in the SAM system, issuance of subaward agreement will be withheld until subrecipient’s SAM registration is complete and active.
5. Print the screen from the SAM system showing details of the subrecipient’s registration, sign, date and upload to WISPER.

**STEPS 4 AND 5 SHOULD BE SKIPPED FOR OTHER UNIVERSITY OF WISCONSIN SYSTEM INSTITUTIONS**

6. Once Subrecipient Commitment Form is provided and subrecipient is not debarred/suspended, upload form into WISPER record and proceed with proposal submission.

**NOTE:** An Authorized Official Representative (AOR) signature is required on the Subrecipient Commitment Form. However, since this is an internal document, a letter of commitment should also be provided by the subrecipient for the project proposal because many funding agencies require such letter.