

**University of Florida
Subrecipient Financial System Certification
and Questionnaire**

Your organization has been identified as a pending subrecipient under the University of Florida's prime award identified below:

Prime Sponsor: _____
Prime Award Number: _____
Project Title: _____
Subrecipient PI: _____

Our records indicate your organization is NOT subject to OMB's Audit Circular A-133. In these cases the University of Florida requests your organization complete this questionnaire. The University of Florida will use the information provided to evaluate your organization's administrative ability to adequately manage federal funds prior to releasing funds.

If you have any questions or if this information is not correct and your organization is subject to OMB's A-133 Circular, please contact ufsubawards@ufl.edu.

Financial System Certification

1. **By marking as appropriate and signing below**, the Subrecipient Authorized Official certifies to the University of Florida that the Subrecipient financial system is in accordance with generally accepted accounting principles and:

- Has the capability to identify, in its accounts, all Federal awards, including flow through funds, received and expended and the Federal programs under which they were received.
 Yes No N/A
- Maintains internal controls to assure Federal awards are being managed in compliance with applicable laws, regulations and the provisions of contracts, grants, subawards.
 Yes No N/A
- Includes budgetary controls that preclude incurring obligations in excess of (a) total funds made available under the award and where required, (b) total funds made available for a budget cost category (e.g. Personnel, Travel, etc.). Yes No N/A
- Can prepare appropriate invoices, financial reports and statements, including a schedule of expenditures by Federal award. Yes No N/A
- There are no outstanding audit findings which would impact University of Florida's subaward funding. If there are findings that are relevant to the University of Florida's subaward being issued, please submit a copy of the most recent report that describes the finding and steps being taken to correct the finding. Yes No N/A

<ul style="list-style-type: none">• Authorized Official• _____• _____		
<ul style="list-style-type: none">• Name/Title		Signature/Date

In addition, please review the following, provide the information requested, and certify by signing on the last page:

General Information:

1. Please identify which set of Federal cost principles your organization follows:
 - OMB Circular A-21 (2 CFR 220) Institutions of Higher Education
 - OMB Circular A-87 (2 CFR 225) State and Local Governments
 - OMB Circular A-122 (2 CFR 230) Nonprofit Organizations
 - 45 CFR Part 74, Appendix E Hospitals
 - FAR Part 31.2 For-profit Organizations

2. Subrecipient's Authorized Official certifies to the University of Florida that Subrecipient personnel who have responsibilities of spending, managing and accounting for the funds awarded are familiar with the applicable cost principles identified and are able to determine whether costs in connection with Federal grants/contracts can be considered allocable, allowable, reasonable and necessary. Read and Acknowledged

3. Subrecipient Authorized Official certifies to the University of Florida that the Subrecipient has adequate separation of responsibilities of its personnel so that no one individual has complete authority over an entire financial transaction, for example in the receipt, payment, and recording of cash. Read and Acknowledged

Reporting Requirements

1. Reporting requirements associated with the award from the University of Florida may include Transparency Act reports, financial reports, progress reports, invention reports, and audit reports. Subrecipient Authorized Official will ensure its personnel responsible for submitting such reports will submit on time as specified in the awarding document. Read and Acknowledged

System for Award Management

1. Is the Subrecipient registered in the federal System for Award Management (SAM) database?
 Yes No

If Subrecipient does not have an active registration with SAM, an award cannot be made until the Subrecipient's SAM registration is completed and active. Read and Acknowledged

Public Policy Requirements

1. Subrecipient Authorized Official certifies to the University of Florida that the Subrecipient where applicable, is in compliance with federal public policy requirements. These policies govern such areas as objectivity in research, civil rights, environmental impact, biosafety, drug-free workplace, debarment and suspension, Federal debt, and lobbying with Federal funds, and are intended to ensure fairness and equity, as well as physical and other protections in activities which receive federal financial assistance. Read and Acknowledged

PHS Financial Conflict of Interest Policy

Please check which applies;

- Our organization is registered with the FDP Clearinghouse as an organization that has a PHS compliant FCOI policy.
- If not registered with the FDP Clearinghouse, Subrecipient hereby certifies that it has an active and enforced FCOI policy that is consistent with the provision of 42 CFR Part 50, Subpart F "Responsibility of Applicants for Promoting Objectivity in Research." Subrecipient also certifies that, to the best of Institution's knowledge, (1) all financial disclosures have been made related to the activities that may be funded by or through a resulting agreement, and required by its conflict of interest policy; and (2) all identified conflicts of interest have or will have been satisfactorily managed, reduced or eliminated in accordance with Subrecipient's conflict of interest policy prior to the expenditures of any funds under any resultant agreement.
- Our organization has a **pending** FCOI policy established and will adopt and implement this FCOI policy prior to execution of the subaward agreement that is compliant with PHS policy using the Federal Demonstration Partnership (FDP) Model Policy as a guide.

NSF Financial Conflict of Interest Policy

Please check which applies:

- Our organization has and implements a NSF compliant FCOI policy.
- Our organization has a **pending** NSF FCOI compliant policy established and will adopt and implement this FCOI policy prior to execution of the subaward agreement.

Protection of Human Subjects in Research

Please provide your Federal-wide Assurance (FWA) that indicates that it will comply with the regulations pertaining to the protection of human subjects in research ([45 CFR Part 46](#)), unless the research is exempt under 45 CFR 46.101(b). Upon request and if applicable the most recent IRB approval for use of human subjects in the research project will be provided.

Federal-wide Assurance (FWA) _____

Subrecipient Authorized official certifies that all Key Personnel involved in a project which involves human subject research will or have completed an educational program in the protection of human subjects.

Read and Acknowledged

Care and Use of Laboratory Animals in Research

If the project being funded by the University of Florida involves the use of animals, Subrecipient Authorized Official certifies that it has a policy which provides for institutional oversight of the humane use of animal research subjects that is compliant with the [Guide for the Care and Use of Laboratory Animals](#). Foreign grantees are required to follow the [International Guiding Principles for Biomedical Research Involving Animals](#). Read and Acknowledged

Research Integrity and Research Misconduct

The Authorized Official certifies that the Subrecipient has established administrative policies as required by [42 CFR Part 93](#), Subpart A "PHS Policies on Research Misconduct." Read and Acknowledged

Responsible Conduct in Research (RCR) Training

Subrecipient Authorized Official certifies that Subrecipient maintains an Institutional Plan to meet NSF's, NIFA's and NIH Educational Requirements for the Responsible Conduct of Research (RCR). Subrecipient certifies it has RCR Training programs in place and will train all appropriate NSF, NIFA, and NIH funded program directors, undergraduate students, graduate students, and postdoctoral researchers in accordance with each federal agency's specific RCR training requirements.

Read and Acknowledged

<ul style="list-style-type: none">• The information, certifications and representations above have been read, signed and made by the Subrecipient Authorized Official below:• _____• Name/Title Signature/Date
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