

SUBRECIPIENT COMMITMENT FORM

This form should be completed by someone who a) is knowledgeable about your organization's business processes and b) possesses information on the scope of work to be carried out by your organization's Principal Investigator / Project Director. The form must be approved and signed by your organization's Authorized Organizational Representative (AOR). The AOR is the individual who has the authority to legally bind your organization in grant administration matters.

ECTION A: NAU Proposal Information be completed by the NAU PI (or delegate) prior to submission to OSP.
Name of NAU PI:
Title of Proposal:
Name of Subrecipient Organization:
Notice of Funding Announcement Number: Notice of Funding Announcement URL:
ECTION B: Subrecipient Eligibility be completed by the Subrecipient prior to submission to OSP.
SUBRECIPIENT:
I certify that my organization is correctly categorized as a subrecipient and is not a contractor:
(check as applicable)
Performance represents an intellectually significant portion of the overall programmatic effort and is measured against the objectives of the program.
Will use the funds to carry out a program for public purpose, as opposed to providing goods or services for the benefit of NAU.
☐ Is responsible for adhering to applicable program requirements specified in the prime award.
There is an identified PI for the subrecipient who has responsibility for making programmatic decisions.
CONTRACTOR: (check as applicable)
Provides goods or services that are ancillary to the operation of the program identified in the prime award.
Provide the goods or services purchased with the funds within normal business operations.
Provides similar goods or services to many different purchasers.
Is not subject to the compliance requirement of the program as a result of the agreement with NAU normally operates in a competitive environment.

If any of the boxes above are checked, contact the Prime PI immediately to provide additional information on potential contractor provisions



ELIGIBILI	TY:	
Yes	No 🗌	Is the subrecipient presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from participation in any federal department or agency?
Yes	No 🗌	Is the subrecipient delinquent on repayment of any federal debt including direct and guaranteed loans or other debt as defined in OMB Circular A-129, "Managing Federal Credit Programs"?
Yes	No 🗌	Is your PI (or any other employee/student planning to participate in this project) debarred, suspended or otherwise, excluded from or ineligible for participation in federal assistance programs or activities?
Yes 🗌	No 🗌	Is your organization presently indicted for or otherwise criminally or civilly charged by a government entity?
Yes 🗌	No 🗌	Has the organization within three (3 years) preceding this offer, had one or more contracts terminated for default by any federal agency?
		ent Information precipient prior to submission to OSP.
PI Email:		PI Phone Number:
Proposed	Period of Per	formance: Start Date: End Date:
Amount o	of Funding R	equested: Cost-Share: Yes No No
		If yes, Cost-Share Amount:
Organizat	ion Legal Na	ame:
Organizations Address:		
		(Include ZIP Code +4 or other postal code)
Performa	nce Site Add	
	n ce Site Add from above)	

(Include ZIP Code +4 or other postal code)

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Organization Type:				
☐ University	☐ Industry/For-Profit		Other Non-Profit	
Other:	_			
If your organization is for-profit, che	ck any of the foll	owing that applies	to your organization:	
Small Business	☐ Veteran-Owne Business	ed Small	Women-Owned small Business	
☐ Small Disadvantage Business	Service-Disab Owned Small		☐ HUBZone Small Business	
Subrecipient Award Admin Contact I	Name: (responsibl	e for subaward proces	ssing)	
Award Admin Email:				
Award Admin Phone Number:				
Award Admin Address:				
_				
US (Domestic) Entities		Non-US (I	nternational) Entities	
ORGANIZATIONAL REGISTRATION	I INFO:	ORGANIZATIONA	AL REGISTRATION INFO:	
Unique Entity Identifier (UEI):		North American Industry Classification System (NAIS) Code:		
Federal Employer Identification Nu	mber (EIN):			
			and Government Entity	
CAGE (Commercial and Governme	ent Entity)	(NCAGE) Code:		
Congressional District:		Registered in SA	M? Yes No No	
Registered in SAM? Yes No				
Expiration Date:		Expiration Date:		
Are you planning to sub-grant/contra	act any part of th	e project? Yes] No [
Estimated Budget:				
Sub-Grantee(s) / Sub-Contractor(s)	Legal Name:			



Che	ck any of the following that ap _l	oly t	o those sub-grantees / cont	ractors	s:
	Small Business		Veteran-Owned Small Business	[☐ Women-Owned Small Business
	Small Disadvantage Business		Service-Disabled Veteran- Owned Small Business	[☐ HUBZone Small Business
	TION D: Certifications completed by the Subrecipient prior t	o sul	omission to OSP		
	ndirect Cost (IDC) rates include Our federally negotiated IDC r provide a link)				
[15% Modified Total Direct Cos	t (M	TDC) de minimis IDC rate per	2 CFF	₹ 200.
[Other rates:	_%	(attach a description of the basis	on whi	ich the rate has been calculated)
	My organization has used the	Spo	nsor's published limited IDC c	ар.	
2. F	Fringe benefit rates included in	this	proposal have been calcula	ated b	ased on: (check as applicable)
[Federally negotiated rates (att federally negotiated rate agreement)				
[Other rates (please explain):				
[Not applicable (please explain -	i.e.	no fringe benefit requested)		
	Research Subject Compliance I		mation: clude Embryonic Stem Cells	s?	



Yes No	Will human subjects be involved in the subrecipient's portion of this project?		
	If yes:		
	- Provide your organization's Federal Wide Assurance #:		
	 Attach an explanation and relevant documents including (but not limited to) Institutional Review Board (IRB) or Ethics Committee approval. 		
	If yes and NIH funding is involved:		
	 Attach documentation confirming all key personnel have completed "human subjects training". 		
Yes No	Will animal subjects be involved in the subrecipient's portion of this project?		
	If yes:		
	 Attach an explanation and relevant documents including (but not limited to) the Institutional Animal Care and Use Committee (IACUC) approval notification. 		
	- Provide a PHS Animal Welfare Assurance Number (domestic institutions) or an AAALAC accreditation number (international institutions):		
4. Responsible Condu	ict of Research (RCR): (for NSF-funded projects only)		
Yes No	My organization certifies that it has an Institutional Plan to meet NSF's Educational Requirements for the RCR, as required under the "America COMPETES Act" Public Law 110-69-August 9, 2007.		
Yes No No	My organization certifies that it has a Safe and Inclusive Working Environment Plan in place for any off-campus or off-site work or research.		
Yes No	My organization certifies that it has a RCR training program in place and will train all undergraduate students, graduate students, postdoctoral researchers, faculty, and other senior/key personnel supported by NSF on relevant RCR topics including mentoring and mentorship as required by NSF.		
5. Financial Conflict of	f Interest (FCOI):		
	ole to this project because it is not being funded by any Sponsor that has adopted the disclosure requirements.		
Subrecipient has	s an active and enforced FCOI policy that is compliant with the prime sponsor policy.		
	s a pending FCOI policy established and will adopt and implement a policy prior to subaward agreement that is compliant with the prime sponsor policy.		
☐ Subrecipient does not have an active or enforced FCOI policy and agrees to adopt NAU's policy.			



If subrecipient does not have an active or enforced FCOI policy, <u>AND</u> NASA or NSF is the prime sponsor:

- Do any of your 'Investigator' personnel listed on this project, their spouse, registered domestic partner, and/or dependent children have any financial interests related to their institutional responsibilities, as listed below:
 - Receipt of income or other payment for services over the past 12 months from and/or equity interest(s) in a publicly traded company.
 - Receipt of income or payment for services over the past 12 months from any single business entity exceeding \$10,000.
 - Any equity interest, including venture or capital financing, in a private non-publicly traded company.
 - Any intellectual property interest assigned or to be assigned to any entity that is not a non-profit organization.

5.5				
Yes 🗌	No 🗌			

If subrecipient does not have an active or enforced FCOI policy, <u>AND</u> NIH or DOE is the prime sponsor:

- Do any of your 'Investigator' personnel listed on this project, their spouse, registered domestic partner, and/or dependent children have any financial interests related to your institutional responsibilities, as listed below:
 - Receipt of income or other payment for services over the past 12 months from and/or equity interest(s) in a publicly traded company.
 - Receipt of income or other payment for services over the past 12 months from a non-publicly traded entity totaling more than \$5,000.
 - Any equity interest(s) in a non-publicly traded entity.

proposed project.

Yes ☐ No ☐

• Receipt of payments totaling more than \$5,000 for any intellectual property rights and interests (e.g., from patents, copyrights assigned to any entity that is not a non-profit organization.

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6. Lobbying: (for U.S. federa	rojects only)
Yes No	Subrecipient organization certifies that no payments have been paid or will be paid to any person for influencing or attempting to influence an officer or

employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this



7. Participation in Foreign Talent Recruitment Programs - Mandatory Certification (only check the box below most relevant to your institution)
☐ Subrecipient has an active and enforced policy addressing federal requirements to disclose participation in Foreign Talent Recruitment Programs (FTRP) and prohibiting participation in Malign FTRPs for covered individuals on federal awards.
☐ Subrecipient does not have an active or enforced FTRP policy and agrees to adopt NAU's policy "Participation in Foreign Talent Recruitment Programs."
If you do not have an active or enforced FTRP policy, answer the following:
Are any of the 'Key Personnel' listed on this project participating in, or party to, a FTRP?
A FTRP is any program, position, or activity that involves compensation of any kind, including but not limited to:
 cash; in-kind compensation, including research funding, promised future compensation, complimentary foreign travel, things of non de minimis value, honorific titles, career advancement opportunities, or other types of remuneration or consideration, that is directly provided by a foreign country at any level (national, provincial, or local) or their designee, or an entity based in, funded by, or affiliated with a foreign country, whether or not directly sponsored by the foreign country, to an individual, whether directly or indirectly stated in the arrangement, contract, or other documentation at issue.
*International collaboration activities that involve open and reciprocal exchange of scientific information are not generally considered FTRPs, and do not need to be disclosed. For the complete official definition of a FTRP and a list of common international collaboration activities that do not qualify as FTRPs, see page 3 of the OSTP Memo Guidelines for Federal Research Agencies Regarding Foreign Talent Recruitment Programs.
Yes No No
Are any of the 'Key Personnel' listed on this project participating in, or party to, a Malign FTRP?
A <u>Malign FTRP</u> is any program that a) meets the definition of an FTRP, b) requires the individual participant to engage in activities that are antithetical to the principles of integrity, transparency, and open science, and c) is funded or supported by a foreign country of concern as designated by the U.S. Department of State. As of 2024 there are four countries of concern: the People's Republic of China, Russian Federation, the Democratic People's Republic of Korea (North Korea), and the Islamic Republic of Iran.
*For the complete official definition of "Malign FTRPs" and a list of activities that qualify as malign, see page 5 of the OSTP Memo Guidelines for Federal Research Agencies Regarding Foreign Talent Recruitment Programs.
Yes No No



8. Audit Status / Fisca	I Responsibility:
☐ My organizatio	n is a non-Federal entity that is subject to the single audit requirement.
(See: §200.501	of the Uniform Guidance) If checked, attach any findings or exceptions noted in the most
recent single audi	t and provide a link to the report.
=	rganization is not subject to the provisions of OMB Circular A-133 because the check as applicable)
☐ Expends le	ss than \$1,000,000 in federal awards annually.
☐ Is a for-prof	it entity.
☐ Is a non-US	S entity.
Other (attac	h explanation)
9. Affirmative Action C	Compliance
organization has mor	ne rules and regulations of the US Secretary of Labor (41 CFR 60-1 and 60-2), if your re than 50 employees and the subaward will be for \$50,000 or more, you are required mative action program.
Indicate whether yo	our organization has a written affirmative action program: (check as applicable)
☐ Yes, we have a	written affirmative action program developed and on file.
☐ No, we do not h	ave a written affirmative action program.
□ Not applicable, \$50,000.	as we have less than 50 employees and/or anticipate our subaward to be less than
10. Financial Systems	
The subrecipient fir	nancial system is in accordance with generally accepted accounting principles
Yes No	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 No	Maintains internal controls to ensure Federal awards are being managed in compliance with applicable laws, regulations, and the provisions of contracts, grants, and subawards.
Yes No No	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	Can prepare appropriate invoices, financial reports and statements, including a schedule of expenditures of Federal awards (SEFA).



11. Executive	e Compensati	on: (complete only when collaborating on a federal project)	
Yes	No 🗌	During the previous fiscal year, my organization received e or more of its annual gross revenues in federal awards ANI dollars (\$25M) or more in annual gross revenues from federal awards and gross f	D twenty-five million
Yes No My organization regularly reports information on the compensation of its see executives in response to section 13(a) or 15 (d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78(d) or section 6104 of the Internal Rever Code of 1986?			curities Exchange
		If "Yes" to the first question AND "No" to the second q	uestion,
		Enter the name of the senior executives and the associated below:	d total compensation
		NAMES:	TOTAL COMPENSATION
		Project-Specific Documentation bient prior to submission to OSP.	
	_	nts are included in the subrecipient subaward proposal ns in Section D: (check as applicable)	submission and
		- includes work to be performed, project description, PI, peres, and milestones.	iod of performance,
☐ Deta	illed budget - i	ncludes budget for the entire length of the project, broken do	own by budget period.
☐ Budg	get justification	ı - includes a reasonable level of detail.	
☐ Othe	er supporting d	ocuments for key personnel as required by the sponsor.	



PI Signature:

SECTION F: Subrecipient Principal Investigator Certification

I certify that the information provided in the proposal and this form is current, accurate, and complete. I will honor any commitments and compliance responsibilities agreed to in the proposal and this form. I understand that: a) any work we begin and/or expenses we incur related to our proposal prior to full execution of a subaward agreement and without a signed 'Authorization to Proceed' letter will be at my organization's own risk, and b) no work involving human subjects and/or animals may begin until my organization has obtained registered Institutional Review Board and/or Animal Care and Use Committee review and approval. I also certify that, at the time of signature, I am not a participant in, or a party to, a malign foreign talent recruitment program.

Date:

Name and Title of PI:		
Email: Phone:		
CTION G: Subrecipient's Authorized (be completed by the Subrecipient prior to sub	Official Representative (AOR) Approval omission to OSP.	
organization will honor any commitment herein. I understand that: a) any work full execution of a subaward agreeme organization's own risk, and b) no v	ed in our proposals and on this form is true and correct, and my ents made in our proposals. I am the AOR of the subrecipient named a we begin and/or expenses we incur related to our proposal prior to ent and without a signed 'Authorization to Proceed' letter will be at my work involving human subjects and/or animals may begin until my Institutional Review Board and/or Animal Care and Use Committee	
Signature of Subrecipient's Authori	ized Official:	
	Date:	
Name and Title of Authorized Offici	al:	
Phone:	Fax:	
Email:		
Email for Subagreement Document	s:	
If Subrecipient is owned or contr	rolled by a parent entity, provide the following information:	
Parent Entity Legal Name:		
Parent Entity Congressional D	District:	
Parent Entity Address:		
	(include ZIP Code +4 or other postal code)	
Parent Entity UEI:	Parent Entity EIN:	