

City of Columbus
Department of Finance and Management
Grants Management Policy and Procedures
revised 6/1/2021

CHECKLIST TO DETERMINE SUBRECIPIENT, BENEFICIARY OR CONTRACTOR CLASSIFICATION PER OFFICE OF MANAGEMENT AND BUDGET'S UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL, 2 CFR 200 (UNIFORM GUIDANCE)

For every contract that is funded from federal funds, a determination needs to be made if the vendor is a "subrecipient" or a "contractor". For the contracts that are funded from the American Recovery Plan Act, a third designation of "beneficiary" is permitted. If it is determined that the vendor is a "subrecipient" then a Risk Assessment shall be performed during the term of the contract.

The grant agreement and/or federal guidance will indicate how a "subrecipient", a "beneficiary" and a "contractor" are defined. **This form is applicable only to use of federal funds that follow Uniform Guidance (e.g. CDBG, CDBG-CV, HOME, ESG, ESG-CV, HOPWA, HOPWA-CV, CRF/CARES Act, ARPA, etc.).**

Complete the checklist below and retain in the contract file per your department's record retention policy.

Grantor Agency Name: **USDOJ, Office on Violence Against Women**

Grant CFDA and Name and Program Year: **16.590 OVW Fiscal Year 2021 Firearms Technical Assistance Project Pilot Sites Initiative**

Grantee Department Name: City of Columbus- City Attorney

Grantee Name of Employee Completing Determination: **Bridget L. DeCrane**

Date the Determination is Completed: **8/10/2022**

Subrecipient Agency Name: **Research Institute at Nationwide Children's Hospital Research Institute DBA Abigail Wexner Research Institute**

Contract Name: **Domestic Violence Wrap Around Response Pilot** PO Number: TBA

Briefly describe the purpose/goals of these funds and, if the vendor is a sub recipient, how and on what interval these outcomes will be assessed:

Please refer to subaward contract scope of work attached to ordinance 2030-2022.

Section 1 – SUBRECIPIENT

Description: A subaward is for the purpose of carrying out a portion of the city’s Federal award and creates a Federal assistance relationship between the city and the outside entity. Characteristics which support the classifications of the outside entity as a subrecipient include when the outside entity:

- Determines who is eligible to receive what Federal assistance;**
- Has its performance measured in relation to whether objectives of a Federal program were met;**
- Has responsibility for programmatic decision making;**
- In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.**

Outside entities that include one or more of these characteristics are responsible for adherence to applicable Federal program requirements specified in the Federal award.

Section 2 – BENEFICIARY

Description: A benefit is granted for purpose of maintaining standard operations and may be used for operating costs including personnel, supplies, equipment, rent, etc. Characteristics indicative of a beneficiary relationship between the city and an outside entity are when the outside entity:

- Is facing reduced revenues and difficulty maintaining standard operations;**
- Requires assistance for operating costs including payroll, rent, supplies, etc;**
- Provides goods or services that are ancillary to the operation of the Federal program.**
- is receiving funding from the American Recovery Plan Act**

Entities that include these characteristics are not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

Section 3 – CONTRACTOR

Description: A contract is for purpose of obtaining goods and services for the city’s own use and creates a procurement relationship with the outside entity. Characteristics indicative of a procurement relationship between the city and an outside entity are when the outside entity:

- Provides the goods and services within normal business operations;**
- Provides similar goods or services to many different purchasers;**
- Normally operates in a competitive environment;**
- Provides goods or services that are ancillary to the operation of the Federal program.**

Entities that include these characteristics are not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

FINAL DETERMINATION:

SUBRECIPIENT **BENEFICIARY** **CONTRACTOR**

Explanation of Determination if not clearly made by the criteria above:

Bridget L. DeCrane
Print Employee Name


Employee Signature

8/10/2022
Date