



SUBRECIPIENT COMMITMENT FORM 33

Stanford University requires completion of the Subrecipient Commitment Form 33 for all proposed subrecipients at the time of proposal submission to the prime sponsor. Subrecipient agreements cannot be fully executed without a complete and up-to-date OSR Form 33.

Please download and complete this fillable PDF Form 33 and attach all required documents directly to this PDF file. As you complete the form, note the following:



Do not complete this form on your browser. Download the file to your desktop before starting.



After you have attached documents to the PDF, you can view, delete or save them by clicking the paperclip icon on the left side navigation of the PDF;



Use the Save icon to save the PDF as a fillable file. Please do not “print to PDF” or scan a hard copy of the form; and



Stanford University prefers electronic signatures. If you need to print a hard copy to sign, please upload a scanned copy of the signature page to this file where indicated.

If you have any questions about completing OSR Form 33, contact the Office of Sponsored Research via email to osr_intake@stanford.edu. Thank you.



SUBRECIPIENT COMMITMENT FORM 33

INSTITUTION		PROJECT	
Legal Name and Address (in SAM.gov)		Address where research will be performed Same as legal address	
Zip+4 Congressional District:		Zip+4 Congressional District:	
DUNS Number		Stanford Principal Investigator	
		Last	First
Federal Employer Identification Number (EIN)		Subrecipient Principal Investigator	
		Last	First
FDP Member? Yes	Type of Organization	Subaward Period of Performance	Amount Requested
Prime Sponsor			
Project Title			

PROPOSAL COMPONENTS		
The following documents are included in our proposal submission and covered by the certifications below		
Required Components	As applicable per sponsor requirements	
Scope of work	Key Personnel Biosketches	Other _____
Detailed budget	Current & Pending Support	_____
Budget justification		

A. TECHNICAL INFORMATION

1. SUBRECIPIENT CLASSIFICATION

The requirements and responsibilities of Stanford Subrecipients are different from those of a vendor.

Subrecipient	Vendor
<ul style="list-style-type: none"> - Responsible for significant programmatic decision-making - Responsible for adherence to applicable sponsor program compliance requirements - Uses sponsor funds to carry out a Scope of Work for Stanford - Statement of work may result in intellectual property or publishable results 	<ul style="list-style-type: none"> - Provides goods and services within normal business operations - Provides similar goods or services to other customers - Provides goods or services that are ancillary to Stanford's sponsored project - Is not subject to compliance requirements of Stanford's sponsor

Yes No Our organization is properly categorized as a subrecipient based on our scope of work.

2. COMPLIANCE

Our scope of work includes:

Human Subjects	Approval Date: _____	Pending
Human Stem Cells	Approval Date: _____	Pending
Animal Subjects	Approval Date: _____	Pending

Subrecipient's IRB and/or IACUC approval must be provided to Stanford's Office of Sponsored Research when available. Stanford's compliance panel must review the subaward work and issue a companion approval before a subaward will be issued.

Yes No If human subjects are involved, have all key personnel completed Human Subjects Training?

B. BUDGET INFORMATION

1. FACILITIES AND ADMINISTRATIVE RATES

We have applied our federally-negotiated F&A rates. Our negotiated rate agreement is:

Attached Available at:

We do not have a federally-negotiated rate but have applied:

a negotiated F&A rate with Stanford with the attached documentation substantiating the rate.

10% de minimus rate (The 10% rate will apply to subsequent subawards to your institution from Stanford until you elect to negotiate an F&A rate)

We have applied other rates as required by the prime sponsor policies/guidelines.



SUBRECIPIENT COMMITMENT FORM 33

2. FRINGE BENEFIT RATES

We have applied rates consistent with or lower than our federally-negotiated rates. Our negotiated rate agreement is:

Attached Available at:

We do not have a federally-negotiated rate and have applied actual fringe benefits (specify the benefit categories below).

We have applied other rates (specify the basis on which rates have been calculated, including elements used in calculation, below).

3. COST-SHARING

Yes No Amount: _____ *Cost sharing amounts and justification should be included in the subrecipient's budget.*

C. CERTIFICATIONS

1. CONFLICT OF INTEREST (CoI) Select one:

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

Subrecipient Organization/Institution certifies that it has an active and enforced conflict of interest policy that is consistent with the provision of 42 CFR Part 50, Subpart F "Responsibility of Applicants for Promoting Objectivity in Research" and 45 CFR Part 94 "Responsible Prospective Contractors." Subrecipient also certifies that, to the best of Institution's knowledge, (1) all financial disclosures will be 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 and within a timely manner sufficient to enable timely FCOI reporting.

Subrecipient does not have an active and/or enforced CoI policy, but will have a PHS compliant policy in place and published at the time of award. (A sample policy can be found at http://sites.nationalacademies.org/PGA/fdp/PGA_061001).

Subrecipient does not have an active and/or enforced CoI policy and agrees to adopt Stanford's policy and training located online at <http://doresearch.stanford.edu/training/conflicts-interest>.

By signing below, Subrecipient certifies that the required training will be completed by each investigator prior to engaging in any research related to any PHS funded contract/grant.

2. DEBARMENT AND SUSPENSION Answer all

- Subrecipient, the PI or any other employee or student participating in this project are*/ are not debarred, suspended, proposed for debarment, declared ineligible, or otherwise excluded from or ineligible for participation in federal assistance programs, federal contracts, or activities.
- Subrecipient, the PI or any other employee or student participating in this project are*/ are not presently indicted for, or otherwise criminally or civilly charged by a government entity.
- Subrecipient has*/ has 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 obtain, or performing a public (federal, state or local) contract or 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.
- Subrecipient has*/ has not within three (3) years preceding this offer, had any contract terminated for default by any federal agency.

* If checked, explain below.

COMMENTS

APPROVED FOR SUBRECIPIENT

The information, certifications and representations above have been read, signed and made by an authorized official of the Subrecipient named. The appropriate programmatic and administrative personnel involved in this application are aware of agency policy regarding 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.**

	Name and Title of Authorized Official		
_____ Signature of Authorized Institutional Official	_____ Date	Email	Phone