

The SPA Project Officer requires the following materials and forms, at a minimum, during proposal review if subrecipients are included in the proposal:

- [Subrecipient/Contractor Classification Form](#)
- A statement of work (SOW)
- Detailed budget
- Budget justification
- Biosketch for each key personnel listed by the subrecipient
- [Subaward Face Page](#) (**rev. July 2022**) signed by the subrecipient's institutional official, or the individual who can legally bind the institution.
- A [Pre-award Assessment of the Proposed Subawards Form](#) if the aggregate amount of all proposed subrecipients in the grant or contract proposal exceeds 50% of the total prime award.
- **If subrecipient is foreign**, SPA will need a completed [International Research Questionnaire \(IRQ\)](#).

#### **Facilities & Administrative (F&A) rates:**

If subrecipient is **not** in the [FDP Expanded Clearinghouse](#), then the SPA Project Officer will also need:

- If sponsor is federal - a copy of the most recent U.S. federally Negotiated Indirect Cost Rate Agreement (NICRA).
  - Prior to proposal submission to SPA, inform the SPA Project Officer if a proposed subrecipient does not have a NICRA to discuss the options.
  - **NOTE** NIH caps F&A to 8% for **foreign subrecipients**, regardless if foreign subrecipient has a NICRA.
  - **NOTE** NSF - if **foreign subrecipient** does not have a NICRA, the NSF grantee will fund the foreign subrecipient using the *de minimis* indirect cost rate recovery of 10% of modified total direct costs.

#### **Financial Conflict of Interest Policy (FCOI) certification:**

Additional forms may be necessary if the prime sponsor is a PHS agency, or the sponsor follows the PHS Financial Conflict of Interest (FCOI) Regulation, ([42 CFR 50, Subpart F](#), "Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought").

- A certification from the proposed subrecipient that it has an FCOI policy that complies with the PHS FCOI Regulation will be needed. This can be checked several ways:
  - The [FDP Expanded Clearinghouse](#); or
  - The [FDP FCOI Clearinghouse](#).
- If the entity does not have a certification in the above clearinghouses, the SPA Project Officer will need:
  - Columbia University's [Subrecipient FCOI Policy Confirmation Form](#).
  - If proposed subrecipient entity indicates they do not have a FCOI Policy on this form, additional follow-up will be necessary after proposal submission, using the [Follow-Up Subrecipient FCOI Policy Form](#).

Under very unusual circumstances, Principal Investigators can request that subrecipients be covered under Columbia's COI policy. This form is to be used to request that such an exception be granted for a particular subrecipient on a specific project: [Subrecipient Conflict of Interest Exception Request Form](#)