

Subrecipient vs. Contractor

The criteria for determining whether an entity is considered a subrecipient or a contractor/consultant is defined in 2 CFR § 200.331 and requires evaluation based on a number of characteristics listed below. Not all characteristics must be present. If unsure, please contact ORA for review and disposition. You can reach ORA via an email to mra@med.miami.edu.



	Subrecipient	Contractor/Consultant
Scope of Work	<ul style="list-style-type: none"> Has their performance measured in relation to whether objectives of the Federal program were met. Has responsibility for programmatic decision making. Uses the Federal funds to carry out a program for a public purpose specified by authorizing statute. 	<ul style="list-style-type: none"> Provides goods and services within normal business operations. Provides similar goods or services to many different purchasers. Normally operates in a competitive environment. Provides goods and services that are ancillary to the operation of the Federal program.
Terms and Conditions	<ul style="list-style-type: none"> Bound by terms and conditions contained within the prime award. 	<ul style="list-style-type: none"> Not bound by terms and conditions of the prime award.
Financials	<ul style="list-style-type: none"> Provides a detailed budget which must abide by cost principles (2 CFR 200 Subpart E). 	<ul style="list-style-type: none"> Provides an hourly, daily or deliverable rate plus travel costs (if applicable). Typically, contracted based upon milestones or deliverables.
F&A	<ul style="list-style-type: none"> Incorporates Facilities & Administrative Costs consistent with their federally negotiated Facilities & Administrative Rate Agreement. If they do not have a federally negotiated rate, may incorporate a de minimis rate of 10% as defined in 2 CFR 200.414. 	<ul style="list-style-type: none"> Facilities & Administrative rates are not applicable. Incorporates all costs within their hourly, daily or deliverable rate.
Salary Limitations	<ul style="list-style-type: none"> Adheres to salary limitations contained within prime award and flowed down. 	<ul style="list-style-type: none"> Not bound by salary limitations contained within the prime award.
Compliance Requirements	<ul style="list-style-type: none"> Adheres to compliance requirements contained within prime award and flowed down. 	<ul style="list-style-type: none"> Not bound by compliance requirements contained within the prime award.
Intellectual Property	<ul style="list-style-type: none"> Actively engaged in the science; therefore, may be co-author on publications or may seek protection from inventions. 	<ul style="list-style-type: none"> Not entitled to publication and intellectual property rights.
Handled by	<ul style="list-style-type: none"> The Office of Research Administration. Please see the Subcontracting to Another Entity page. 	<ul style="list-style-type: none"> Purchasing (Academic/Research) or UHealth Supply Chain Services. Please see the Contract Routing Matrix.