



Entity Form for non-FDP Expanded Clearinghouse Subrecipients

Pass Through Entity (PTE):	Virginia Commonwealth University	PTE DUNS:	10-530-0446
VCU Principal Investigator		VCU Proposal # (if known)	
Subrecipient Entity Name		Subrecipient DUNS	
Address/City/State/Zip			
Country		Telephone	
Is this address also the place of performance?			
If no, Place of Performance			
Subrecipient PI			
Subrecipient Project Title			

1. Is your organization registered in SAM.gov? (System for Award Management)
2. Is your organization or the personnel for this project currently debarred or suspended?
3. Is your organization subject to Single Audit as defined in 2 CFR 200, Uniform Guidance?
4. Does your organization have a negotiated rate agreement with the federal government?
 - a. If no, have you agreed to utilize the "de minimis" indirect cost rate of 10% on all federally-funded sponsored projects?
5. Does your organization have established accounting and procurement systems?

6. Conflict of Interest policy and process (choose one of the following):

- 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." Subrecipient also certifies that, to the best of the Institution's knowledge, (1) all financial related to the activities that may be funded by or through a resulting agreement, are up to date as required by its conflict of interest policy; (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 (3) all identified conflicts and resultant management plans will be reported to VCU's Office of Sponsored Programs to enable compliance with federal reporting requirements.
- Subrecipient Organization/Institution **does not have** an active and/or enforced conflict of interest policy and agrees to abide by VCU's [Conflicts of Interest in Research](#) policy. **Note: The Subrecipient PI and other designated investigators must complete the Subrecipient Interest Disclosure Form. Prior to proposal submission, forward the completed form to VCU's COI in Research Program at AIRS@vcu.edu for confidential hold. Failure to complete this form will prevent proposal submission.**
- Not applicable** because this project is not funded by NIH, NSF, or another sponsor that has adopted the federal financial disclosure requirements. List of sponsors available at the [FDP FCOI Clearinghouse](#).

APPROVED FOR SUBRECIPIENT: The information, certifications and assurances above have been read, signed and made by an authorized official of the Subrecipient named herein. The appropriate programmatic and administrative personnel involved in this application are aware of agency policy in regard to 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.

Further, if abiding by VCU's *Conflicts of Interest in Research* policy, Subrecipient and subrecipient investigators, have read and understand said policy, will make all required reports, and, prior to expenditure of any awarded funds, if applicable, shall obtain an account in the VCU Activity & Interests Reporting System, complete the COI training, the electronic Financial Interest Report and work with VCU to reduce, manage, or eliminate any conflicts of interest, if any.

Name and Title of Subrecipient Authorized Official	Signature of Subrecipient's Authorized Official	Date