



with a sub recipient organization.

Concept of Substantive Work

Sponsored research awards made to CSULB are primarily conducted by CSULB faculty and staff. On occasion substantive programmatic work is carried out by one or more institutions (aka sub-recipients), who are made responsible for a portion of an award made to CSULB. The concept of substantive work conducted by a sub-recipient is defined as follows: Project activities with a primary purpose of the research program, which are not conducted at CSULB. These activities constitute a significant portion of the research program and require the leadership and direction of a responsible investigator located at the work site of the cooperating entity. (Normally, a sub recipient organization will provide critical project expertise, which CSULB as the PTE does not possess.)

Distinguishing between a Sub Award Recipient and a Contractor

2 CFR 200.330 provides guidance in the distinction between a sub-recipient doing substantive work and a contractor providing goods and services as outlined below.

<p><i>Sub-Award Recipients.</i> A sub-award is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the sub-recipient. See §200.92 Subaward. Characteristics which support the classification of the non-Federal entity as a sub-recipient include when the non-Federal entity:</p>	<p><i>Contractors.</i> A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. See §200.22 Contract. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the contractor:</p>
<p>Determines who is eligible to receive what Federal assistance;</p>	<p>Provides the goods and services within normal business operations;</p>
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important than the form of the agreement. All of the characteristics listed above may not be present in all cases; therefore, ORSP must use judgment in classifying each agreement as a sub-award or a procurement contract.

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