

CHECKLIST FOR DETERMINING IF A TRANSFEREE IS A VENDOR OR SUBRECIPIENT

Agency Name (Transferor): _____

Name of Transferee/Provider: _____

NO		Vendor	Sub recipient
1	Are funds provided to transferee in advance of any expenditure?	No	Yes
2	Are funds being transferred in return for receipt of goods or services?	No	Yes
3	Does the transferee provide the goods or services within its normal business operations?	No	Yes
4	Does the transferee provide the same or similar goods or services commercially to others?	No	Yes
5	Are actual costs (including indirect charges) reimbursed?	No	Yes
6	Does transferee have authority to make programmatic decisions (i.e. decide which activities and services are provided)?	No	Yes
7	Is the entity a political subdivision or was it created by one?	No	Yes
8	Are the goods or services implicit/essential to the Federal/State program?	No	Yes
9	Is the transferee a political subdivision with no profit motive?	No	Yes
10	Is on-site monitoring performed by the transferor?	No	Yes
11	Is the transferee required to provide matching funds?	No	Yes
12	Does the transferee determine program eligibility based on independent criteria?	No	Yes
13	Is the transferee required to provide periodic reports to measure compliance?	No	Yes
14	Is transferee responsible for adherence to applicable Federal/State program compliance requirements?	No	Yes
15	Are funds provided to transferee to carry out its own program?	No	Yes
CONCLUSION			
VENDOR		SUBRECIPIENT	

This checklist provides general guidance as to the issues used to determine whether a transferee is a vendor or subrecipient. However, every situation is unique. Therefore, a fact specific determination should be made on a case-by-case basis. As the checklist illustrates, the main focus is whether the transferee "stands in the shoes" of the funding agency and the degree of programmatic control that the transferee exhibits.