



ANNUAL SUBRECIPIENT MONITORING COMPLIANCE CERTIFICATION (EXTENDED)

Our records indicate that your organization was a subrecipient of research funds awarded to and pass-through via a subaward/subcontract agreement from the RAND Corporation during your recently ended fiscal year or is currently being considered for a new subaward/subcontract agreement. This form is required from all subrecipients at least annually to assist RAND in performing our subrecipient monitoring activities on all active subrecipients and to ensure our procurement system records for your organization are up to date. Failure to complete this form could be considered non-compliance and could result in delays in the issuance of new funding or suspension of current funding. See the last page for definitions and resources for additional information.

Please have an authorized representative from your organization sign and return this form, along with any required additional documentation, via email to SubMonitoring@rand.org within ten business days. Thank you for your cooperation in this matter.

SECTION A: SUBRECIPIENT PROFILE

In accordance with US Government regulations and as major prime federal contractor, RAND is required to maintain a Small Business Program and periodically report to the Government our procurement activity.

SUBRECIPIENT ENTITY INFORMATION

Legal Name of Subrecipient Organization: _____

Doing Business As (DBA) Name, if different: _____

DUNS: _____ Federal Tax ID Number: _____ Recently Completed/Ended Fiscal Year End Date: _____

Do you have a Parent Entity? ☐ NO ☐ YES, Name/TID/DUNS of Parent: _____

System for Award Management (SAM) Expiration Date: _____ Unique Entity Number (UEI) assigned to you by SAM (if available)? _____

Mailing Address: _____

ADDRESS CITY STATE ZIP+4 COUNTRY

Point of Contact for Subaward Agreements: _____

Name to which payments should be made: _____

Remit to Address (if different from above): _____

Accounts Payable Email: _____ Phone: _____ Fax: _____

Preferred Payment Method: ☐ CHECK ☐ ACH/EFT (please attach bank information) ☐ Wire Transfer (please attach bank information)

NAICS Code(s) applicable to your Organizations subaward/subcontract collaboration work: _____

Does your Organization have an active profile on the Federal Demonstration Partnership (FDP) Expanded Clearinghouse website: ☐ NO ☐ YES

Select Your Organizations Federal Tax Classification from the following options:

- | | | |
|--|--|--|
| <input type="checkbox"/> Individual/Sole Proprietor | <input type="checkbox"/> C Corporation | <input type="checkbox"/> Limited Liability Company (LLC) |
| <input type="checkbox"/> Trust / Estate | <input type="checkbox"/> S Corporation | <input type="checkbox"/> Partnership |
| <input type="checkbox"/> State/Local Government | <input type="checkbox"/> Foreign | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Exempt Payee (exempt from backup withholding) | | |

BUSINESS CLASSIFICATION & DIVERSITY INFORMATION

All suppliers must select either "Large Business Concern (LBC)" or "Small Business Concern (SBC)" from the options below. Additionally, everyone should select any sub-classification that applies and multiple sub-classifications may be appropriate. See the FAQ section for definitions and resources for additional information on these classifications.

LARGE BUSINESS CONCERN (LBC) <i>Dominant in field of operations per Federal Acquisitions Circular (FAC 9.201)</i>	SMALL BUSINESS CONCERN (SBC) <i>Independently owned and operated, and meets industry size and receipt requirements for small businesses per SBA 13 CFR 121. Section 3 of the Small Business Act.</i>
LBC SUB CLASSIFICATIONS (Select all that apply): <input type="checkbox"/> Minority-Owned Business (MBE) <input type="checkbox"/> Woman-Owned Business (WBE)	SBC SUB CLASSIFICATIONS (Select all that apply): <input type="checkbox"/> Small Disadvantaged Business (SDB) <input type="checkbox"/> Woman-Owned Small Business (WOSB) <input type="checkbox"/> Historically Black Colleges/Universities & Minority Institutions <input type="checkbox"/> Alaskan Native Corporations (ANCs) & Indian Tribes <input type="checkbox"/> HUBZone Small Business (HUB Zone) <input type="checkbox"/> Veteran-Owned Small Business (VOSB) <input type="checkbox"/> Service Disabled Veteran-Owned Small Business (SDVOSB)

Notice: Under 15 U.S.C. 645(d), any person who misrepresents a firm's status as a small business concern in order to obtain a contract to be awarded under the preference programs established pursuant to sections 8(a), 8(d), 9 or 15 of the Small Business Act, or any other provision of Federal law that specifically references section 8(d) for a definition of program eligibility, shall: (a) be punished by imposition of a fine, imprisonment, or both; (b) be subject to administrative remedies, including suspension and debarment; and (c) be ineligible for participation in programs conducted under the authority of the Act.

SECTION B: SUBRECIPIENT COMPLAINEE

As required under 2 CFR 200—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance"), RAND is required to verify that each subrecipient that was issued pass-through funding is in compliance with all Federal statutes and regulations.

TYPE OF ORGANIZATION

Select from the drop down list the type of organization you are classified as in accordance with the definition in 2 CFR 200 Subpart A – Acronyms and Definitions

Were there any organizational new management personnel or new and/or substantially changed business systems during the last year?

FOR ORGANIZATIONS SUBJECT TO UNIFORM GUIDANCE SECTION 2 C.F.R. § 200.501:

We have not yet completed our annual single audit for the fiscal year. We will advise you of the results and provide a complete copy of the audit report when completed.

Expected Completion Date: _____

We have completed our annual single audit and it has been uploaded to the Federal Audit Clearinghouse website. There were no material weaknesses, significant deficiencies, reportable conditions, or findings related to any subaward(s) issued to our organization from the RAND Corporation.

We have completed our annual single audit and it has been uploaded to the Federal Audit Clearinghouse website. There were instances of noncompliance, reportable conditions, or findings related to subaward(s) issued to our organization from the RAND Corporation.

We are not subject to OMB Uniform Guidance 2 C.F.R. § 200.501 because:

Our organization is a For-Profit Entity (note that US Federal Agency specific terms may still require you to undergo a single audit or other audit)

Our organization expended less than \$750,000 total in Federal Awards in the most recently completed/ended Fiscal Year stated in Section A of this form

Another exception applies (explain; note that "Foreign" is no longer a permitted exception unless the US Federal Agency has specified an exemption): _____



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ORGANIZATIONS WHO ARE NOT SUBJECT TO 2 C.F.R. § 200.501 MUST COMPLETE THE FOLLOWING SECTION:

External independent audits for my organization have been completed for the most recent fiscal year. A complete copy of the audit report is enclosed.

My organization/company has not been audited by a U.S. Government audit agency or by an independent Certified Public Accounting (CPA) firm for the most recent fiscal year. True and correct information concerning my organization are provided in the attached Financial Status Questionnaire, and in the attached unaudited financial statements covering the most recent fiscal year

*NOTE: For organizations that **do not** undergo a single audit or have audited financials, please provide a copy of your unaudited financials.*

Please check if the statement is true/accurate for your organization:

<input type="checkbox"/>	Other than financial statements, some aspect of your organization's activities has been audited within the last 2 years by a governmental agency or independent public account. (Please provide a copy of any recent external audit report.)
<input type="checkbox"/>	Duties are separated so that no one individual has complete authority over an entire financial transaction.
<input type="checkbox"/>	Your organization is not debarred or suspended and no employees working on RAND subawards are debarred or suspended.
<input type="checkbox"/>	Your organization has controls to prevent expenditure of funds in excess of approved, budgeted amounts.
<input type="checkbox"/>	Your organization has procedures in place to ensure that awarded funds are used only during the authorized period of performance.
<input type="checkbox"/>	All disbursements are properly documented with evidence of receipt of goods or performance of services.
<input type="checkbox"/>	All bank accounts are reconciled monthly.
<input type="checkbox"/>	Payroll charges are checked against program budgets.
<input type="checkbox"/>	There are procedures to ensure procurement at competitive prices.
<input type="checkbox"/>	There is an effective system of authorization and approval of capital equipment expenditures and travel expenditures.
<input type="checkbox"/>	There are detailed records of individual capital assets kept and periodically balanced with the general ledger accounts.
<input type="checkbox"/>	There are effective procedures for authorizing payment and accounting for the disposal of property and equipment.
<input type="checkbox"/>	Your organization has an indirect cost allocation plan or a negotiated indirect cost rate. (Please provide a copy of current rate agreement)
<input type="checkbox"/>	Your organization has a negotiated fringe benefit agreement.
<input type="checkbox"/>	Your organization has procedures that provide assurance that consistent treatment is applied in the distribution of charges to all grants, contracts and cooperative agreements.
<input type="checkbox"/>	Your organization has a formal policy of nondiscrimination and a formal system for complying with United States federal civil rights requirements.
<input type="checkbox"/>	Your organization has a cash forecasting process that will minimize the time elapsed between the drawing down of funds and the disbursement of those funds.
<input type="checkbox"/>	If your organization enters into agreements for work or research to be performed outside of the United States, it has systems in place to prevent and detect payments made to government officials in violation of the U.S. Foreign Corrupt Practices Act to allow or procure work and research opportunities for or on behalf of your organization.
<input type="checkbox"/>	Your organization's procurement staff have working knowledge of the FAR and OMB Administrative Requirements (Uniform Guidance) that are applicable to purchasing.
<input type="checkbox"/>	You maintain internal controls to ensure that subawards/contracts are issued only to eligible subrecipients / vendors.
<input type="checkbox"/>	Your organization has procedures in place to ensure subrecipients are provided with flow-through award information and compliance requirements, that subrecipient activities are monitored, that subrecipient audit findings are resolved, and that the impact of any subrecipient noncompliance is evaluated and addressed.
<input type="checkbox"/>	Your organization has formal, written policies to address: Pay rates and benefits Time and attendance / effort reporting Leave Travel Purchasing

Please answer the following questions:

What system does your organization use to control paid time, especially time charged to sponsored agreements?	
Briefly describe your organization's policies concerning capitalization and depreciation.	
How does your organization ensure that all cost transfers performed are legitimate and appropriate?	
Please describe the process for determining the indirect costs and fringe benefit expenses you charge RAND. (Answer only if you do NOT have negotiated rates)	
How does your organization determine that it has met cost sharing goals?	
Does your organization engage in any lobbying or partisan political activity which is charged, directly or indirectly, to a federally assisted program? If yes, please describe.	
Does your organization have a formal system for complying with the Davis-Bacon Act which requires payment of prevailing wages on federal contracts? If yes, please describe.	
Does your organization have a formal policy of nondiscrimination and a formal system for complying with U.S. Federal civil rights requirements? If yes, please describe.	
What was the dollar volume of U.S. Federal Government awards to your organization during the last fiscal year? (Provide by Agency and dollar amount)	

COMMENTS

By signing, I certify that the information provided is accurate, and that all audit findings relating to funds provided by the RAND Corporation have been disclosed. I further certify that my organization is in compliance with OMB UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS, and with all other laws and regulations, to the extent it is applicable to subawards from RAND.

PRINTED NAME AND TITLE: _____

CERTIFIED BY (SIGNATURE): _____ DATE: _____



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DEFINITIONS AND RESOURCES FOR ADDITIONAL INFORMATION

2 CFR 200—*Uniform Administrative Requirements, Cost Principles, and Audit Requirements For Federal Awards* ("Uniform Guidance") provides rules and regulations applicable to federal funded awards issued by the Office of Management and Budget (OMB). See the e-CFR website at <http://www.ecfr.gov/> to view the current version of the regulations.

The **Federal Demonstration Partnership (FDP)** is a cooperative initiative among 10 federal agencies and over 150 institutional recipients of federal funds. The Expanded Clearinghouse (<https://fdpclearinghouse.org/>) is an FDP-authorized system that publishes on-line organizational profiles for use in lieu of subrecipient commitment forms. Pass-through entities utilize this publicly-available information when issuing subawards or monitoring subrecipient organizations. This publicly available website provides online organization profiles to obtain entity-based information needed by pass-through entities when they are issuing subawards or monitoring their subrecipient entities.

The **System for Award Management (SAM)** is an official website of the US Government found at <https://www.sam.gov/>. There is no cost or registration fee to be a part of this database. SAM can be a marketing tool for businesses as the website allows Government agencies and other contractors to search for your company based on your ability, size, location, experience, ownership, and more. SAM also informs searchers of firms certified by the SBA under the [8\(a\) Development](#) and [HUBZone](#) Programs.

Information regarding the new 12-character Unique Entity Identifier (UEI) numbers being assigned via SAM can be found at <https://www.gsa.gov/about-us/organization/federal-acquisition-service/office-of-systems-management/integrated-award-environment-iae/iae-information-kit/unique-entity-identifier-update>

NOTE: Some federally funded contracts and/or grants may require your Entity to register in SAM before any funding can be awarded by RAND.

"**Exempt Payee**" means exempt from backup withholding. Generally, individuals (including sole proprietors) are not exempt from backup withholding. If the payee is not exempt, RAND is required to backup withhold on reportable payments if the payee does not provide a TIN in the manner required or does not sign the certification, if required. Per IRS guidelines, the following payees are exempt from backup withholding:

1. An organization exempt from tax under section 501(a), any IRA, or a custodial account under section 403(b)(7) if the account satisfies the requirements of section 401(f)(2);
2. The United States or any of its agencies or instrumentalities;
3. A state, the District of Columbia, a U.S. commonwealth or possession, or any of their political subdivisions, agencies, or instrumentalities;
4. A foreign government or any of its political subdivisions, agencies, or instrumentalities; or
5. A corporation;
6. A dealer in securities or commodities required to register in the United States, the District of Columbia, or a U.S. commonwealth or possession;
7. A futures commission merchant registered with the Commodity Futures Trading Commission;
8. A real estate investment trust;
9. An entity registered at all times during the tax year under the Investment Company Act of 1940;
10. A common trust fund operated by a bank under section 584(a);
11. A financial institution;
12. A middleman known in the investment community as a nominee or custodian; or
13. A trust exempt from tax under section 664 or described in section 4947.

The North American Industry Classification System (NAICS) classifies business establishments based on the activities in which they are primarily engaged. NAICS codes are also used for administrative, contracting, and tax purposes. NAICS is production oriented (not product oriented) and categorizes businesses with others that have similar methods of production. In order to determine the NAICS applicable to your organization, please visit the following website: <http://www.census.gov/epcd/www/naics.html>. **NOTE: RAND cannot make this determination for your organization.**

To find your ZIP CODE + 4, visit <https://tools.usps.com/go/ZipLookupAction!input.action>

To find your Congressional District, visit <https://www.census.gov/mycd/>

Registering with the US Small Business Administration: <http://www.sba.gov/content/register-government-contracting>

US Small Business Administration Resources: <https://www.sba.gov/contracting/resources-small-businesses>

Small Business Concern

A small business as defined pursuant to Section 3 of the Small Business Act and relevant regulations promulgated pursuant thereto. See <http://www.sba.gov/content/am-i-small-business-concern#>.

Minority-Owned Business (MBE)

Minimum 51% owned, controlled and operated day-to-day by one or more minority individuals; includes the following categories: African American; Hispanic American; Asian-Pacific American; Asian-Indian American; Native American (American Indian, Eskimo, Aleut, Native Hawaiian).

Small Disadvantaged Business (SDB)

Minimum 51% owned, controlled and operated day-to-day by one or more socially disadvantaged individuals. May be Section 8(a)-certified per 13 CFR 124.1002. Small Disadvantaged Ethnicity definitions include the following categories: African American; Hispanic American; Asian-Pacific American; Asian-Indian American; Native American (American Indian, Eskimo, Aleut, Native Hawaiian).

Woman-Owned Business (WBE) &/OR Woman-Owned Small Business (WOSB)

Minimum 51% owned and controlled by one or more women who have active involvement in day-to-day operations.

Historically Black Colleges/Universities & Minority Institutions

An institution determined by the Secretary of Education to meet the requirements of 34 CFR Section 608.2. The term also means any nonprofit research institution that was an integral part of such a college or university before November 14, 1986.

HUBZone Small Business (HUB Zone)

SBA certified; is small and is located in an 'historically underutilized business zone' and is owned, controlled and operated at least 51% by U.S. citizens and at least 35% of employees reside in HUB zone. Visit <http://www.sba.gov/content/applying-hubzone-program> for more information.

Veteran-Owned Small Business (VOSB)

Minimum 51% owned, controlled and operated day-to-day by one or more U.S. veterans.

Service Disabled Veteran-Owned Small Business (SDVOSB)

Minimum 51% owned by one or more service-disabled veterans (if publicly owned, minimum 51% of the stock is owned by one or more service-disabled veterans), and the management and daily business operations of which are controlled by one or more service-disabled veterans (if permanently and severely disabled, by their spouse or primary care giver).

Alaskan Native Corporations (ANCs) & Indian Tribes

"**Alaska Native Corporation (ANC)**" means any Regional Corporation, Village Corporation, Urban Corporation or Group Corporation organized under the laws of the State of Alaska in accordance with the Alaska Native Claims Settlement Act, as amend (43 U.S.C.A. 1601). See FAR 19.701 for more information.

"**Indian Tribe**" means any tribe, band, group, pueblo, or community, including native villages and native groups as defined in the Alaska Native Claims Settlement Act, that is recognized by the Federal government as eligible for services from the Bureau of Indian Affairs. See FAR 19.701 for more information.