

Success as a Pass-Through-Entity: Learn the Essentials to have a Successful Partnership with your Subrecipient.

Questions & Answers

1. What does CFR mean?

CFR is an acronym for Code of Federal Regulations which are the [codified or permanent rules published by the Federal Register](#). When we discuss federal grants and compliance, we are referencing [2 CFR 200 of Uniform Guidance](#) which establishes the uniform administrative rules, requirements, cost principles, and audit requirements for those awards to non-federal entities.

You can learn more about the Federal Register and listen to an explanation of the relationship between the Federal Register and CFR here: [Federal Register Workshop](#)

2. Subrecipient & Contractor: Could you give us a quick example of the two? I can see how their roles could overlap.

It is important to identify and distinguish between a subrecipient and a contractor early on in the grant lifecycle. It may not always seem apparent, and the relationship may not be clearly identified as a non-federal entity may have multiple characteristics that fit into both categories. This can make a determination challenging.

Subrecipient	Contractor
Programmatic decision-making responsibilities	Provides Goods and services as part of normal business
Performance is measured against program objectives	Goods and services are ancillary to programmatic activities
Responsible for federal compliance requirements	Operates in a competitive environment
Awarded via a subaward	Awarded via a contract or purchase order

Tips to Spot a Subrecipient

Is performance measured against program objectives?

Subrecipients contribute to the successful implementation and completion of the federal award and program objectives and are responsible for the success of the federal grant.

Do they make programmatic decisions?

Subrecipients usually have responsibility for programmatic decision-making related to their work.

What regulations are they required to comply with?

Subrecipients must comply with Uniform guidance as well as agency specific rules and their award terms and conditions.



Are federal funds being used to carry out program work?

Funds awarded to subrecipients are used to carry out and complete objectives of the grant and do not only provide goods and services.

3. What is a NOFO?

A NOFO is a Notice of Funding Opportunity. A Notice of Funding Opportunity (NOFO) normally refers to a published notice by a federal awarding agency. The State also uses this term when discussing funding opportunities published by State Agencies providing federal dollars to a subrecipient through a Request for Funding Proposal or RFP. The terms may sometimes be used interchangeably.

4. What was NOGA?

A NOGA is a Notice of Grant Award, it may also be called a NOA, or Notice of Award.

5. Should the identity of the reviewers be public information?

It is not required that the reviewer's identity be made available. Scored proposals can identify reviewers as Reviewer 1, Reviewer 2, Reviewer 3 etc. Please note, if there is a potential perceived conflict of interest and this is of concern, a conflict-of-interest form should be completed and kept on file with the grant opportunity documents.

Principles to keep in mind when reviewing proposals:

- Hold reviewers to strict conflict-of-interest standards
- Maintain confidentiality
- Choose reviewers for their knowledge, skills, and expertise related to the proposal under review
- Evaluate and score each proposal according to the set forth criteria in the Notice of Funding Opportunity
- Consider each proposal on its own merit and do not compare to others
- Consider only what is explicitly written in the proposal and do not make assumption based on personal knowledge of an applicant

6. How do you complete a Technical Review?

When we are reviewing a proposal that has been submitted in response to a Notice of Funding Opportunity (NOFO) for a subaward the pass-through-entity is assessing that proposal and the contractor's ability to perform based on criteria that was established within the NOFO. The entirety of the proposal is considered, including cost.

A technical review typically focuses on parts of a proposal that does not focus on just cost but instead on the ability and understanding that the applicant has provided to achieve their proposed goals.

A review is conducted by a review committee. Proposals should be scored based on alignment to the NOFO as well as with consideration given to the level or risk an applicant might pose based on past performance. Proposals should then be ranked to determine funding.



7. Is a Risk Assessment completed for a Contractor as well?

When completing a procurement contract a risk assessment like that of a subrecipient is not required. Risk is transferred to a contractor through indemnification language which *must* be incorporated into all State contracts. For information on this please review [Insurance Requirements for Contracts](#).

A pass-through entity is also responsible for ensuring that the contractor identified in the contract is not under suspension or on the debarment list. This is done at <https://sam.gov>. In the search bar of SAM.gov provide the search criteria, such as their Unique Entity Identifier (UIE) number or CAGE code to review the contractor's information.

8. Is there a list of acronyms?

OFA does have a current list of acronyms that are federal grant specific, which can be found in the [Nevada Grant Manual](#). We also provide a glossary of terms which can be found at https://ofa.nv.gov/Grant_Resources/Glossary_of_Terms/

You may also explore the [Grant.gov's](#) terminology page (<https://www.grants.gov/learn-grants/grant-terminology>) for terminology commonly used when speaking about the grant lifecycle.

9. Do you have a subgrant and Request for Reimbursement template?

Great question! These templates will be made available on our website December 1st, where they can be found at https://ofa.nv.gov/Grant_Resources/Grant_Resources/

10. Do you have any updated examples of an FAQ that would generally be provided prior to the monitor? If so, do you have any examples that would include the cover letter that would also be provided.

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11. When the Risk Assessment is done on a new award with new funding, would they always be considered a "High" risk? However, what if the funding is more or less pass-through dollars and it's really just a renewal of the grant and or contract?

The subrecipient isn't always considered high-risk when it's a new award with new funding. There are a few other things a PTE may want to consider including:

- A history of performance
- Reporting performance
- Responsive and communicative with the PTE –
- Complexity of the award and
- Organizational internal controls

The renewal of a grant or contract doesn't always make them lower risk either. They might had problems the PTE has identified through monitoring.

Always do a risk assessment prior to issuing a new subaward. Be open to a revision of their risk tier if something is discovered during monitoring or even if there's continued problems with reporting or RFRs or backup documentation.