Exhibit B7

FEDERAL SUBRECIPIENT AND VENDOR DETERMINATION CHECKLIST
(use when funding is Federal or State match on Federal awards)

This Checklist **must** be used by the Department of Health to evaluate the applicability of OMB Circular A-133 to non-federal entities[1] when the funding in the contract/grant is federal or state matching funds on federal awards. This Checklist will assist the Department of Health in determining whether a contract provider/grantee is a subrecipient or a vendor.

Federal awards expended as a subrecipient would be subject to audit under the provisions of OMB Circular A-133. Payments received for goods or services provided as a vendor would not be considered federal awards or financial assistance and are not subject to audit under the provisions of OMB Circular A-133.

Subrecipients of federal awards must also use this Checklist to evaluate the applicability of OMB Circular A-133 to any subcontractors or grantees to which they provide federal resources to assist in carrying out a federal program.

[1]Non-federal entities is defined by OMB Circular A-133 §__.105 as a state, local government or non-profit organization. Accordingly, for-profit organizations are not subject to OMB Circular A-133.

Contract/Grant Number:_____ **Type of Organization:**_____
Name of Non-Federal Entity: _____
Title of Federal Program: Title XIX, Title V, 1915(B) Medipass Waiver
Catalog of Federal Domestic Assistance (CFDA) No. 93.994 & 93.778

SUBRECIPIENT/VENDOR DETERMINATION:

The following should be analyzed for each relationship with a Non-Federal entity where federal funding or state matching resources on a federal award is being provided to the contract provider/grantee.

YES	NO		
☐	☐	(1)	**Does the Non-Federal entity determine who is eligible to receive what Federal financial assistance?**
☐	☐	(2)	**Does the Non-Federal entity have its performance measured against whether the objectives of the Federal program are met (e.g., number of jobs to be created, patients to be seen, etc.)?**
☐	☐	(3)	**Does the Non-Federal entity have responsibility for programmatic decision making (e.g., determine eligibility, case management, etc.)?**
☐	☐	(4)	**Does the Non-Federal entity have responsibility for adherence to applicable Federal program compliance requirements (laws, rules or guidelines specific to the federal program such as eligibility guidelines, etc.)? Note: Specific federal program requirements do not include general guidelines or general laws/rules.**
☐	☐	(5)	**Does the Non-Federal entity use the Federal funds to carry out a program of the Non-Federal entity as compared to providing goods or services for a program of the pass-through entity?**
☐	☐	(6)	**Is the Non-Federal entity required to provide matching funds/resources related to the federal program.**

If any of the above is yes, there is a subrecipient relationship and the Non-Federal entity is subject to OMB Circular A-133. Otherwise, the Contract Provider/Grantee is a vendor and is not subject to OMB Circular A-133.

DETERMINATION: ☐ **SUBRECIPIENT** ☐ **VENDOR** ☐ **EXEMPT (FOR-PROFIT)**

BY:_____ **DATE:** _____
Director of Administration

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