



Non-Competitive (Direct to Award) Subaward Justification Form

Subaward Program/Solicitation Title: _____

Agency and Division: _____

Name/Email of Agency Contact: _____

Target Date for Solicitation Publication: _____

Proposed Subrecipient(s): _____

Proposed Subaward Dollar Amount or Range _____

Federal Program Name: _____

Assistance Listing (CFDA) and/or Federal Award Identification Number(s) (FAIN): _____

Ongoing or Time Limited Program: _____

[Subrecipient/Contractor Determination Tool](#) completed, with a Subrecipient determination: Y N

1. Briefly describe why this program needs a waiver and cannot be posted as a competitive solicitation.
2. Is it **required** by the terms and conditions of the federal award(s)? (E.g. subawards determined by federal formula for a specific set of subrecipients)
Yes No
3. If yes, paste CFR reference and citation. Complete only questions 5, 6 and certification.
4. Is it **authorized** (but not required) by the terms and conditions of the federal award(s)?
Yes No
5. If yes, paste CFR reference and citation.
6. Is the agency including conditions/eligibility criteria beyond those established by the federal award(s)?
Yes No



Information for Agencies issuing Non-Competitive Subawards

Completed *Non-Competitive Subaward Justification* forms submitted via [GMS User Support](#) no later than 21 calendar days prior to publication of a solicitation in GMS meet the “format and schedule established by the Controller...” as required by 220-RICR-20-00-2.6.2(B) Note: This only applies to subawards, or grants funded in whole or in part with federal funds transferred via a state agency acting as a pass-through entity, or non-federal funds designated as match for federal award(s).

Before completing this form, check the funding source(s), and ensure the *Subrecipient/Contractor Determination Tool* has been completed. For information on subrecipient/contractor determinations, refer to the Subrecipient and Contractor Determination section of [Resources for State Agencies](#).

The Grants Management Office (GMO) will review the request and respond in writing to the requesting Agency within 14 calendar days. The Agency may not publish a non-competitive (DTA) solicitation until it has received written (email) approval from the GMO. Approvals for ongoing programs are valid for 5 years from date of approval, absent federal program changes. Approvals for time limited (one-time) programs are valid for the approved FAIN and program only.

Competitive subaward issuance is the preferred method of grant-making, unless otherwise specified in the terms and conditions of the federal award(s). It is the state agency’s responsibility to comply with program requirements established by the federal awarding agency. If your agency limits subrecipient eligibility beyond what is established by the federal awarding agency, such limits must be consistent with applicable laws, regulations, and policies. Personal preferences and existing relationships do not justify limiting eligibility. Your agency must be able to document and justify such restrictions.

UGG’s Part E, Cost Principles, requires that all costs be allowable, reasonable, allocable, and applicable. Your agency may be required to document that costs incurred via a non-competitive subaward are reasonable.

Provide complete information. Forms lacking sufficient detail cannot be approved.