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Defining Grantees and Subgrantees

(A Compliance & Monitoring Treatise)



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What is a “Grantee”?

Per 34 CFR 77.1 → The *long* version...

“Grantee means the legal entity to which a grant is awarded and that is accountable to the Federal Government for the use of the funds provided. The grantee is the entire legal entity even if only a particular component of the entity is designated in the grant award notice (GAN). For example, a GAN may name as the grantee one school or campus of a university. In this case, the granting agency usually intends, or actually intends, that the named component assume primary or sole responsibility for administering the grant-assisted project or program. Nevertheless, the naming of a component of a legal entity as the grantee in a grant award document shall not be construed as relieving the whole legal entity from accountability to the Federal Government for the use of the funds provided. (This definition is not intended to affect the eligibility provision of grant programs in which eligibility is limited to organizations that may be only components of a legal entity.) The term grantee does not include any secondary recipients, such as subgrantees and contractors, that may receive funds from a grantee pursuant to a subgrant or contract. “



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What is a “Grantee”?

*Per Ed → The ***short*** version...*

Grantee* means the entity to which a grant is awarded and that is accountable to the Federal Government for the use of the funds.

**In this definition/context, this does not include any secondary recipients—such as subgrantees and/or subrecipients—that may receive funds from a grantee pursuant to a subgrant or contract.*



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What is a “Non-Federal Entity?”

Per 2 CFR 200.69...

The term “non-Federal entity”* encompasses 5 different organizations:

- 1) State
- 2) Local Government
- 3) Indian Tribe
- 4) IHE (Institute of Higher Education)
- 5) Nonprofit Organization

**In this definition/context, “non-Federal entities” are organizations that carry out a Federal award as either a recipient or subrecipient.*



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What is a “Recipient”?

Per 2 CFR 200.86:

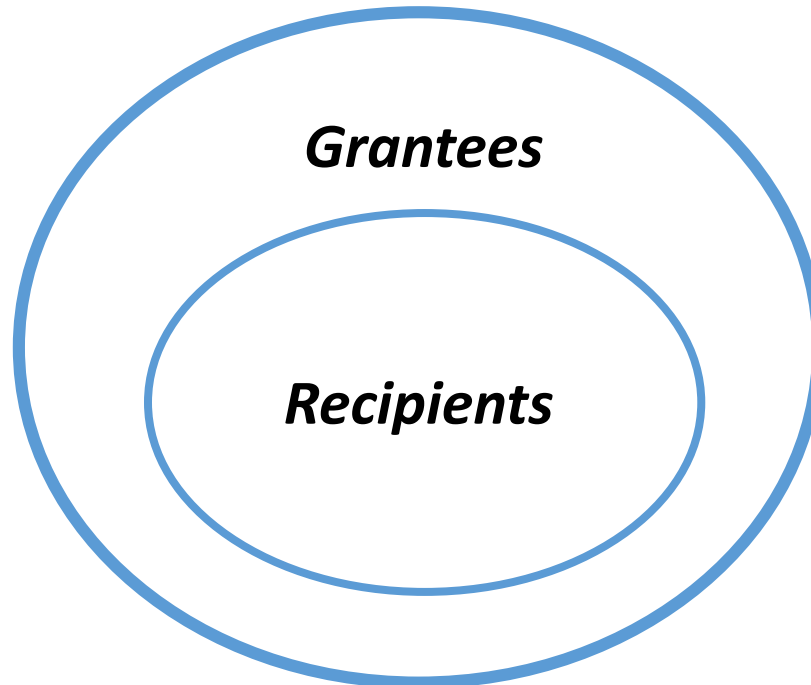
Recipient means a non-Federal entity that receives a Federal award directly from a Federal awarding agency to carry out an activity under a Federal program. The term recipient does not include subrecipients.

**In this definition/context, this does not include any secondary recipients—such as subgrantees and/or subrecipients—that may receive funds from a grantee pursuant to a subgrant or contract.*



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“Grantee” and “Recipient” are used relatively interchangeably throughout the Code of Federal Regulations, but while all recipients are grantees, not all grantees are necessarily recipients...





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What is a “Pass-through Entity”?

Per 2 CFR 200.74...

“Pass-through entity” means a non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.



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What is a “Subgrant”?

Per 34 CFR 77.1:

Subgrant means an award of financial assistance in the form of money, or property in lieu of money, made under a grant by a grantee to an eligible subgrantee. The term includes financial assistance when provided by contractual or any other form of legal agreement, but does not include procurement purchases, nor does it include any form of assistance that is excluded from the definition of grant or award in this part.

What is a “Subaward”?

Per 3 CFR 200.92:

Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.



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What is a “Subgrantee”?

Per 34 CFR 77.1:

“Subgrantee” means the government or other legal entity to which a subgrant is awarded and that is accountable to the grantee for the use of the funds provided.

What is a “Subrecipient”?

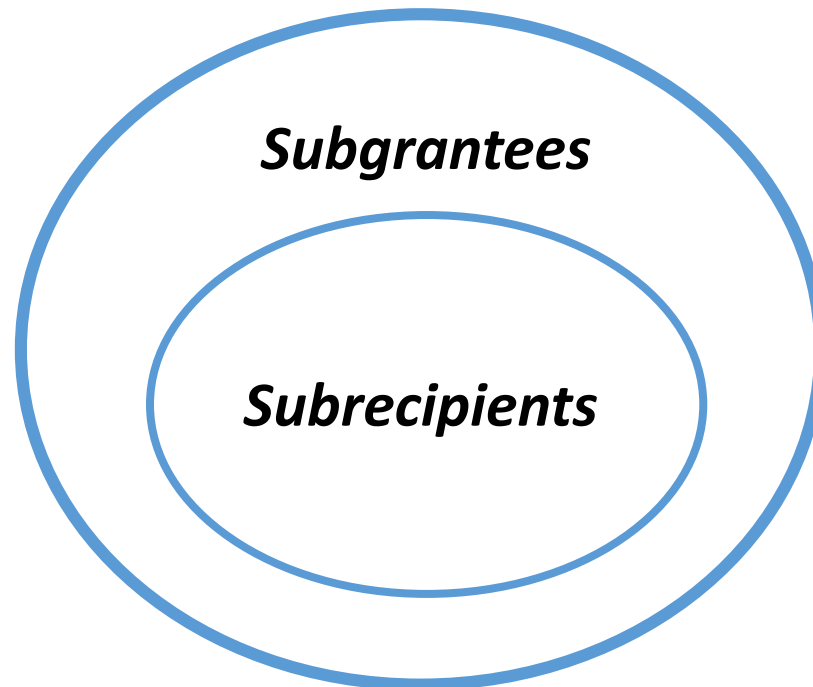
Per 3 CFR 200.93:

“Subrecipient” means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.



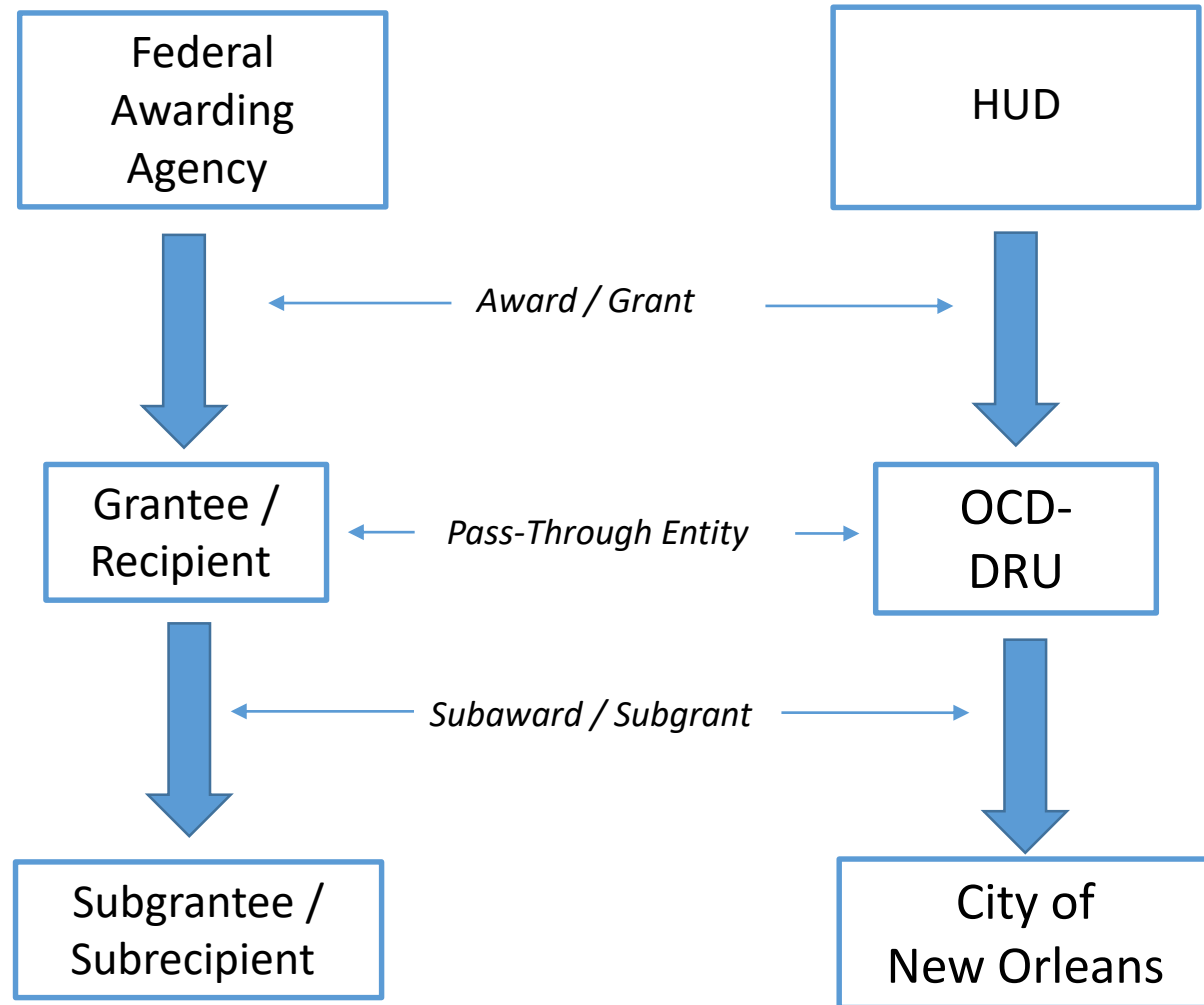
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Very similar to how “Grantee” and “Recipient” are used, “Subgrantee” and “Subrecipient” are used relatively interchangeably throughout the Code of Federal Regulations, but while all subrecipients are subgrantees, not all subgrantees are necessarily subrecipients...





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Questions?