



# Grant Management Policies & Procedures

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Adopted: April 1, 2022

The University's Grant Management Policies and Procedures are intended to provide a uniform method of applying for and managing grants. Procedures represent an implementation of policy and should evolve over time as new tools emerge, new processes are designed, regulations are updated, and assessment of risk changes due to environmental changes.

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## Overview

### Introduction

The purpose of these Grant Management and Administration policies and procedures is to develop, implement and maintain meaningful grant oversight and coordination for the University thereby increasing grant-related revenue, limiting the University's exposure to grant-related legal liability, and improving the efficiency and impact of programs and services funded through grants.

### Policy Statement

To ensure consistency and accountability in securing and managing grant funds, all grant applications must be submitted following the appropriate procedures outlined in this document. Program Managers/Principal Investigators are ultimately responsible for ensuring that all grants follow the appropriate procedures for all requests, application submissions, acceptances, and post award and closeout requirements, including programmatic and financial reporting. The Business Office has sole authority for the drawdown of funds, financial forms required by the grantor, and must review/approve financial reports prior to submission.

### Mandatory Disclosure

As is relates to federally funded awards, the University must disclose, in a timely manner, in writing to the federal awarding agency or pass-through entity all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award. The University will investigate suspicions of such violations and seek advice from counsel prior to disclosing to the federal award agency.

### Compliance with Laws, Regulations, and Provisions of Awards

Heritage University must comply with all applicable terms and conditions of awards, federal laws, regulations, and policies. Applicable grant terms and conditions, policies and regulations include:

- Agency Terms and Conditions (E.g., NSF PAPPG Manual)
- Code of Federal Regulations (CFRs)
  - [2 CFR Part 200](#), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
  - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for **Specific Agency adoption of the Uniform Guidance**
- [Federal Funding Accountability and Transparency Act \(FFATA\)](#)

Recipients must comply with all general terms and conditions above and be knowledgeable of specific terms and conditions detailed in the Notice of Award (NoA). The NoA includes additional program and recipient special conditions.

## **SAM.gov Account**

The **System for Award Management (SAM)** combines the federal procurement systems and the Assistance Listing Numbers – previously known as the Catalog of Federal Domestic Assistance (CFDA) – into a single system. The Business Office has the sole responsibility of establishing and maintaining the University’s SAM account and submitting financial related information and funds drawdowns.

A Unique Entity Identifier (UEI) is a 12-character unique number assigned to all entities who must register to do business with the federal government in SAM. Subrecipients utilized by the University are required to obtain a UEI and provide it to the University for inclusion in the underlying subaward agreement. To obtain direct Federal awards, the University must maintain a full registration in SAM.gov.

Note: On April 4, 2022, the DUNS Number was replaced by the UEI.

## **Definitions**

**Authorized Signatory:** An authorized signatory is a person who has been given the power to sign a contract, instrument, agreement, or legally binding document on behalf of the institution.

- Provost – authorized official for review and approval of academic awards.
- VPAF – authorized official for review and approval of Title V/III grants
  - **VPAF or President are the only individuals who are authorized to sign for federal grants.**
- VPSA – authorized official for review and approval for Student Affairs.
- VPAMA – authorized official for review and approval for Advancement, Marketing, & Admissions.

**Award:** Financial assistance that provides support or stimulation to accomplish a public purpose. Awards include grants and other agreements in the form of money or property in lieu of money, by the grantor to an eligible recipient. The term does not include technical assistance, which provides services instead of money; other assistance in the form of loans, loan guarantees, interest subsidies, or insurance; direct payments of any kind to individuals; and contracts which are required to be entered into and administered under procurement laws and regulations.

**Budget:** The financial plan for the Federal award that the Federal awarding agency or pass-through entity approves during the Federal award process or in subsequent amendments to the Federal award.

**Budget Period:** The time interval from the start date of a funded portion of an award to the end date of that funded portion during which recipients are authorized to expend the funds awarded, including any funds carried forward or other revisions

**Closeout:** the process by which the awarding agency or pass-through entity determines that all applicable administrative actions and all required work of the award have been completed.

**Contracts:** Written agreements entered into by the awarding agency, recipients, or sub-recipients, and commercial (profit-making) and non-profit organizations.

**Cost Sharing/Match:** The grant recipient's share of the project cost. Under Federal grants, match is restricted to the same use of funds as allowed for the Federal funds. Match must be directly related to the project goals and objectives and must be documented in the same manner as grant-funded activities.

**Direct Cost:** Costs that can be specifically identified with a particular cost objective or program; charged directly as a part of the cost of the program.

**Drawdown:** A process whereby a request is made to receive federal funds, either as reimbursement for expenses incurred or in advanced in anticipation of expenditure of funds.

**Grant:** A financial award given by the federal, state, or local government, or a private entity to an eligible grantee, usually with a defined scope of activities or programmatic objectives. Grants do not include technical assistance or other forms of financial assistance such as a loan or loan guarantee, an interest rate subsidy, direct appropriation, or revenue sharing.

**Grantor:** Primary awarding agency (e.g., federal, state government).

**Grantee:** The direct recipient of a grant award who is legally bound by the grantor's award or contract.

**Indirect Cost:** Costs that are incurred by a grantee organization for common or joint objectives and which therefore cannot be identified specifically with a particular project or program.

**In-kind Match:** In-kind match does not involve a monetary transaction. 'In-kind' is the value of something received or provided, which is beneficial to the program, but for which no cash exchanges hands. In-kind contributions related to a particular grant program must be allowable under the grant program, verifiable from grantee records, necessary and reasonable, allowable under cost principles, and not included as a contribution under any other award.

**Notice of Award (NoA):** The official legally binding award document that notifies the recipient of the award of a grant, contains, or references all the terms and conditions of the grant and federal funding limits, and provides the documentary basis for recording the obligation of federal funds in the agencies' accounting systems.

**Program Income:** Gross income earned by the recipient during the funding period as a direct result of the award.

**Program Manager/ Principal Investigator:** The lead staff member who conducts the activities under a particular grant program. Please note that individual funders may refer to this position by various titles (e.g., Project Director), however, whomever is referred to in the application as the lead staff will be considered PM/PI throughout this handbook.

**Period of Performance:** The total time for which support of a funded project has been programmatically approved. A project period may consist of one or more budget periods.

**Reimbursable Grant:** A reimbursable grant provides funding to grant recipients after expenses have been incurred. The grantee must follow a certain procedure to obtain the reimbursement for project expenses. Reimbursements are provided on a set payment schedule after the organization has submitted sufficient documents to verify expenses.

**Subrecipient:** The legal entity to which a sub-award is made, and which is accountable to the recipient for the use of the funds provided. Sub-recipient and sub-awardee are interchangeable terms.

**Sub-award:** An award of financial assistance, generally a monetary award, made to a sub-recipient as a result of an award made to a direct grant recipient to a sub-recipient

**Sub-grant:** An award of financial assistance made under a grant by a direct grantee to an eligible sub-grantee. The term includes financial assistance when provided by contractual legal agreement, but does not include procurement purchases, nor does it include any form of assistance which is excluded from the definition of grant in this part.

**Terms and conditions of award:** All legal requirements imposed on a grant by the awarding office, whether based on statute, regulation, policy, or other document referenced in the NoA, or specified by the NoA itself. In addition to general terms and conditions, the NoA may include other conditions that are considered necessary to attain the award's objectives, facilitate post-award administration, conserve grant funds, or otherwise protect the Federal government's interests.

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## Grant Management Roles and Responsibilities

### *Program Managers/Principal Investigators (PMs/PIs)*

Departments that apply for and utilize grant funds, with assistance from the Grants Manager and the Business Office, are responsible for conducting all grant-related activity including: planning for grant acquisition; preparation and submission of grant proposals including proposals for continuing current awards; identifying grant opportunities; grant writing; preparing budget revision requests to accept grant funds; submitting grant proposals for internal approval; managing grant programs and projects; reviewing budget to actuals and allowable costs; preparing and submitting programmatic reports to grantors; and properly closing out grant projects as detailed in this policy and in the grant agreement or award letter that delineates the terms and conditions of the grant. PMs/PIs are assisted with the financial and technical management of the grant by the Grants Manager and the Business Office.

### *Grants Manager*

The Grants Manager is responsible for general management and administration of the University's grant activities; assists in identifying grant opportunities; provides “pre-award” and “post-award” technical assistance to departments to enhance programmatic administration of grants; assists in preparing grant budgets; prepares and submits grant budget revisions with PMs/PIs; assists PMs/PIs with review of budget to actuals and allowable costs; ensures programmatic reporting requirements are met; and identifies and investigates issues that may arise with respect to the management of agency grants.

### *Business Office*

The Business Office is responsible for the oversight of grant-related financial activity. In this role, the Business Office reviews financial reports generated by the Grants Manager and provides general oversight of other grant-related issues, including the proper budgeting and accounting. The Business office has sole authority for the “drawdown” of funds and must approve all financial reports and reimbursement requests prior to submission.

### *VP of Administration & Finance (VPAF)*

Provides a review of all grants and contracts including memoranda of understanding and employment or procurement contracts arising from implementation of a grant program; ensures statutory compliance and conformity to Federal and State law, as well as rules and policies of the University. The VPAF also submits annual and final financial reports and drawdowns as an authorized official for the University.

*President, Provost, VP of Administration & Finance (VPAF), VP of Student Affairs (VPSA), VP for Advancement, Marketing, & Admissions (VPAMA)*

The “Authorized Official” for grants is the individual with the power to act on behalf of the University and sign grant/contract applications and final agreements to obligate the University to the services outlined in the grant/contract. The individuals with signing authority include:

- Provost – authorized official for review and approval of academic awards.
- VPAF – authorized official for review and approval of Title V/III grants
  - **VPAF or President are the only individuals who are authorized to sign for federal grants.**
- VPSA – authorized official for review and approval for Student Affairs.
- VPAMA – authorized official for review and approval for Advancement, Marketing, & Admissions.

## Application (Pre-Award)

The purpose of this procedure is to ensure that each grant application submitted by or on behalf of the University is aligned with an established University priority, meets the University’s expectations of document quality, has matching funds available if required by grantor, and that the means for continuation of the project or program after the grant period ends has been given realistic consideration.

## Proposal Planning

The department considering an application for a grant is responsible for the pre-application assessment, in which, at a minimum, the factors listed below shall be evaluated, in consultation with the Grants Manager and Business Office staff. Pre-application assessment shall be done well in advance of grant submission due dates to avoid last-minute delays or problems that could cause the grant deadline to be missed. All grant and contract applications require internal review and approval before submission to the funding agency. The PM should use the Grants & Contracts Approval for Application Routing Form ([Appendix I](#)) to document the approval to apply for a grant.

## Pre-Application Assessment

As part of the assessment process, each proposal should be evaluated using the following criteria:

- Financial
  - Total anticipated project cost
  - Match requirements and sources
  - Costs and risk management issues that may be incurred by the

University as a result of implementing the grant program that will not be recouped in the grant award (directly or indirectly).

- Program income considerations
- Staffing requirements (including salary and benefits increases for multi-year grants)
- Administrative
  - Alignment with University's strategic priorities and/or department's business plan
  - Provision or expansion of services to address critical needs
  - Department's capacity to administer the programmatic and administrative aspects of the grant
  - Accreditation requirements and policies to consider and follow

### **Developing the Budget**

Every application to an external sponsor requires a budget explaining the intended use of the funds. A well-planned budget is essential to enhancing the quality of a proposal. If the proposal is successfully funded, the budget will become the project financial plan.

For federal grant applications, the OMB Uniform Guidance (2 CFR Part 200) establishes principles for determining costs applicable to grants, contracts, and other agreements with educational institutions. When preparing a budget involving federal government grants, keep in mind the government uses uniform procedures in dealing with cost analysis, such as consultant fees, overseas costs, per diem, and travel. Foundations have more freedom in what projects they fund and how they fund them but must meet the standards set by Internal Revenue Service to maintain their tax-exempt status. Most sponsors (federal, state, or private) have well developed budget guidelines which should be analyzed before starting work on the project budget. The guidelines could include significant details to costs that are allowable or non-allowable, but they could also contain information regarding limitations on budget amounts, percentages, payments, and so on. Only projects closely following the guidelines will have a chance to be funded.

The PM/PI will work with the Grant Manager, Grant Accountant, or a designated department, to develop the budget for the award and make determinations related to whether a cost can be included in a federal award proposal or charged to a federal award based on knowledge of the federal allowable cost principles, regulations and statutes and the grant agreement and activities. All budgets must be reviewed by the Grant Manager, Business Office, and the authorized signatory during the routing process.

Note: The National Science Foundation (NSF) has specific guidelines for proposal/budget development. The NSF Proposal & Award Policies & Procedures Guide (PAPPG) can be found by clicking [here](#). NSF awards should be developed and reviewed by referring to the PAPPG.

## **Direct Costs**

The direct costs are expenditures that are directly linked with the project or a specific activity in the project. The following are highlights related to direct costs. The OMB Uniform Guidance (2 CFR Part 200) should be reviewed.

- Personnel costs includes salaries for new positions, salary supplements (including summer salary), faculty buyout (also known as course release), and fringe benefits.
- Fringe benefits charged to awards will be based on actuals, confer with the Business Office if assistance is required to budget for Fringe benefits.
- Travel under all grants should be calculated in accordance with the Travel and Business Hosting Procedures and/or Student Travel Procedures.
- Rates for mileage, phone reimbursement, and some other items are assessed annually, and Heritage University can provide these updates for use in budget estimations.
- Any technology (e.g., technology supplies, equipment, or software) that interacts with existing systems should be verified and approved by IT.
- Research subject compensation should be commensurate with the activities they are being asked to do for the research study as per [46CFR46](#).

Allowability of costs should be determined early in the process to avoid the need to restructure the budget and, where required, obtain prior approval from the Federal funding agency to incur the specified item of cost. This includes in-kind costs proposed in the grant.

## **Indirect Costs**

The university has a federally negotiated indirect cost (F&A) rate through the US Department of Education and utilizes a salary and wages base. Unless the sponsor has established a lower indirect cost rate or does not allow any indirect cost charge, all budget proposals should include the University's current indirect cost rate applicable to salary and wages in the budget. The University's current indirect cost rate can be obtained via the Business Office. The maximum indirect cost rate allowed by the funding source should be identified on the Grants & Contracts Approval for Application Routing Form ([Appendix I](#)).

## **Writing the Proposal**

The project narrative should be written such that someone unfamiliar with the proposed project/program can obtain a complete picture of what it plans to accomplish, how it will be accomplished, how it will be evaluated, how much it will cost, how long it will take to accomplish the goals and objectives, and what benefits it will provide. Grant reviewers are often not familiar with the specific academic areas; thus, narratives should be written for intelligent, but uninformed, readers. The

PM/PI are responsible for developing the project narrative. If additional assistance is required, the PM/PI should request assistance from additional contributors as soon as possible.

If HU needs to contract with a third-party grant writer. The PM/PI will be responsible for following the University's procurement process for contracting with the grant writer. The PM/PI (with assistance from the Grant Manager) will be responsible for working with the grant writer and appropriately moving the final product through the University's internal approval process.

### **Submitting the Proposal**

All grant and contract applications require internal review and approval before submission to the funding agency.

The PM/PI and/or Department Directors are responsible for moving the grant proposal through the routing and approval process as described in this procedure (See [Grant Proposal Routing Process](#)). Complete proposals must be submitted for internal review **at least fourteen (14) business days** before the deadline for submitting the completed grant proposal to the funding agency. During the final review process, the PM/PI is responsible for coordinating the grant application elements and to clarify commitments by staff who will be working on the project if awarded (this should include IT, HR, IRB, and Business Office staff).

If a Memorandum of Understanding (MOU) or subcontract is required to be submitted with the grant proposal, they may require additional time (up to two weeks) to review and approve the documents. Written requests for an exception to the 14-business day deadline may be considered in rare cases. Requests may be emailed to the authorized signatory.

Proposals should be ideally submitted to the funders at least two business days before the proposal deadline and only after the [Grant Proposal Routing Process](#) is complete and the approval of the application package is confirmed by the authorized signatory. (Variances to this timeline may occur on a case-by-case basis.)

## Grant Proposal Routing Process

The Grant Proposal Routing Process – Some Variances May Occur on Case-by-Case Basis.

### Pre-Routing

**Step 1:** The internal grant routing begins at least 14 business days before the submission deadline. In preparation for routing, PMs/PIs must discuss the grant with their department director and work with the Grant Manager and Business Office. When necessary, the PM/PI should also seek assistance from HR, IT, IRB and other appropriate staff to maximize the prospect of an excellent proposal being submitted. During this **pre-routing** process, The PM/PI should:

- IMPORTANT:** Review Funding Agency terms and conditions to determine if there are additional steps, or approval processes required.
- Identify key application requirements, including number of pages, key budget guidelines, and cost sharing requirements
- Review items requiring prior written approval from the grantor and include them in the proposal when appropriate
- Develop the budget and budget justification (seek assistance if necessary)
- Identifying compliance or legal issues
- Check consistency of narrative against requirements from funding agency
- Obtain and review sub-recipient information (if applicable)
- Identify any cost sharing commitments which may require prior approval

### 14 Business Days

**Step 2:** At this point, a routing form signed by the VPAF, and a *reasonably complete* draft of proposal should be provided.

- Narrative is close to final. Revisions would not include significant changes to the proposed program.
- Budget and budget justification are complete.
- All attachments, including any MOU's, are present.
- IRB review has been completed, when necessary, for human subject research.

### 14-5 Business Days

**Step 3:** PM/PI will start the routing process as soon as possible by seeking approvals from appropriate departments depending on the nature of the proposal. Routing process participants commit to an initial review and response in writing within 48 hours. If applicable, a sub-recipient risk analysis will be performed. PM/PI will receive feedback generated by different departments as routing proceeds.

### 5 Business Days

**Step 4:** Five business days before submission deadline, PM/PI provides a final and complete application to the Grant Manager to review for consistency and compliance. No major revisions should be made after this point only minor edits determined necessary by the routing review.

### 2 Business Days

**Step 5:** Two business days before submission deadline, no additional changes without authorized signatory approval. The 2 business days prior to submission provides the opportunity for final review. Submission will be done as soon as application is approved. The authorized signatory must approve before submission.

## Application Submission Procedure

1. Approval to submit a grant application shall be presented to the authorized signatory, only after obtaining signatures from:
  - a) PM/PI
  - b) Department Chair/Director (If different from PM/PI)
  - c) Grants Manager
  - d) VPAF
2. The Grants Manager will provide critical review of grant applications to ensure accuracy, document quality, coordination, and ensure that the review process and timelines are followed.

## Award Notification, Review, and Acceptance

Grant agreements are legal contracts. It is the University's responsibility to carry out the project and/or activities associated with a grant to accomplish its objectives, while adhering to all of the terms and conditions prescribed by the grantor. Failure to do so increases the University's exposure to legal liability and compromises current and future grant funding. Therefore, the University carries a significant legal and ethical responsibility when accepting grant funding.

The Award Notification, Review, and Acceptance Process has two components: (1) award notification and review and (2) University's approval to accept the award.

## Award Notification and Review Procedures

Funders send award letters or non-award letters to notify grant applicants regarding the award status. Any correspondence such as award notification letters from funders should be immediately forwarded to the Grant Manager for a timely response. Funders may offer less than the requested amount or may ask for a revision of the project scope. The PM/PI, Grant Manager, and VPAF will review the award and the project plan to determine if a revised plan/budget should be submitted. For awards that include a contract, the PM/PI, Grant Manager, authorized signatory, and VPAF will review the terms and conditions and negotiate with the funder as needed.

All grant contracts must be reviewed and signed by an authorized representative of Heritage University. In most cases, the President, Provost, VPAF, VPSA, or VPAMA are the designated authorized signers for grant contracts. The Grant Manager works with the authorized signatory to review and eventually approve. This review process takes approximately 10 days.

1. All departments that receive a grant award shall forward a copy of the award notification, the grant agreement or contract, and any memoranda of understanding to the Grant Manager, VPAF, and authorized signatory within

two business days of receipt. These grant documents should also be stored in the central grants management file.

2. The department is responsible for reviewing the grant award and ensuring that University approval to accept the award is completed by the date required by the grantor for full execution.
3. The PM/PI should work with the Grant Manager to read and understand the agreement, terms & conditions, and any special conditions. The PM/PI should understand the allowability of costs under the award.
4. In the event that funds awarded by the granting entity are reduced from those requested in the original grant application, or factors previously evaluated at the time of application have changed, the department must ensure that the goals, objectives, and evaluative components of the grant can still be accomplished within the prescribed timeframe set by the grantor.
5. Any proposed modification to the grant objectives, personnel, contractors, etc. must be approved by the authorized signatory in writing before any proposed changes can be communicated to the program officer or grantor.

Approval to submit a grant application shall be presented to the authorized signatory, only after obtaining signatures from:

- a) PM/PI
- b) Department Chair/Director (If different from PM/PI)
- c) Grants Manager
- d) VPAF

The Grants Manager will provide critical review of grant applications to ensure accuracy, document quality, coordination, and ensure that the review process and timelines are followed.

6. If award terms need to be amended before the grant award can be accepted, the PM/PI with assistance from the Grant Manager must negotiate with the grantor and obtain changes to the grant award in writing.
  - a) If the award terms are negotiated to the department's satisfaction, the department must request that the grantor provide the changes in writing. When the changes have been received in writing from the grantor, the department must submit the grant agreement or contract, any memoranda of understanding and written changes from the grantor to the Grant Manager, VPAF, and authorized signatory within two business days of receipt.
  - b) If the award terms cannot be negotiated to the department's satisfaction, the PM/PI upon authorization of the authorized signatory, the submitting department must prepare a letter to the granting entity to decline the award and provide a copy of the letter to the Grant Manager, VPAF, and

authorized signatory. The letter should express the University's regret in declining the award and clearly articulate the specific reason(s) the award is being declined.

7. The VPAF shall conduct a review of the grant agreement to assess whether the terms and conditions of the agreement are legally enforceable and ensure the University's interests are protected prior to the authorized signatory accepting grant funds.

If the legal review identifies any potential legal issues stemming from the terms and conditions of the agreement, the submitting department must contact the granting entity and seek to resolve the issue.

- a) If a resolution cannot be reached, the PM/PI upon authorization of the authorized signatory, the submitting department must prepare a letter to the granting entity to decline the award and provide a copy of the letter to the Grant Manager, VPAF, and authorized signatory. The letter should express the University's regret in declining the award and clearly articulate the specific reason(s) the award is being declined.
- b) If the VPAF identifies no potential legal issues stemming from the terms and conditions of the agreement, the department may submit a request to the authorized signatory to approve the acceptance of the grant funds.

### **University Approval to Accept Award Procedure**

The purpose of this procedure is to ensure that acceptance of each award granted to the Agency is formally authorized by the University, through the review and acceptance by the authorized signatory.

1. The department receiving the grant award must request University approval through the authorized signatory before any funds from the granting entity are accepted, appropriated, or expended. The request must be accompanied by the award letter, grant agreement and any other required documentation.
2. Once the authorized signatory has approved the grant award, the PM/PI shall notify the Grants Manager and Business Office of the University's action.
3. The department must upload the approved request for approval from the authorized signatory, award letter, approved budget, and the original signed grant agreement to the Master Grant File and notify the Grant Manager and Business Office of the file locations.
4. The Business Office will then add the grant award to the department's budget. Each grant will be maintained in a separate fund source, project and/or organizational code. Separate accountability by funding source shall

be maintained and all Federal programs must be properly identified by their individual Assistance Listing numbers. One account may not include funding from more than one funding source. Co-mingling of funds is strictly prohibited and could lead to disallowed costs. Exception is allowed only for an extension and/or renewal of the same program/project with the same sponsors. Approval must be granted by the Controller which is done on a case-by-case basis.

5. Using the budget submitted with the proposal, and any related revisions, the Grant Manager and Grant Accountant will work with the PM/PI to manage fiscal activity and financial reporting and audit aspects of the project. The Grant Manager and Grant Accountant are available to answer fiscal questions raised by the PM/PI concerning project expenditures, payroll expenses, indirect costs, etc.
6. The department is responsible for submitting any required award activation documents to the grantor by the grant award due date. Copies of these documents should be stored in the Master Grant File. The department will be assisted with the technical aspects of activating a grant by the Grants Manager.

### **Grant Management Orientation**

After the contract is signed by both Heritage University and the funder, the Grant Manager will host one grant orientation meeting with the PI. Depending on the complexity of the award agreement other staff may be included. The orientation provides the PI and their departments with an overview on the following:

- Completion of the Grant Intake Form ([Appendix II](#))
- Project account number and budget
- The PM/PI's responsibilities as to grant policies, compliance guidelines, and reporting
- Subaward monitoring plan, as needed
- Expenditure coding and expenditure monitoring
- Guidelines on purchasing, including equipment, supplies, and travel
- Guidelines on hiring long-term employees funded by grants
- Guidelines on hiring short-term employees, external consultants, and contractors funded by grants

## **Post-Award (Grant Execution and Reporting)**

### **Use and Receipt of Grant Funds**

The purpose of this procedure is to ensure that grant funds are properly used and received by the University. Violations can result in a range of penalties, including suspension of future funds from the grantor, return of all funds associated with the award, including those already expended, and civil and/or criminal penalties.

Heritage University understands that as a recipient of Federal funds that Heritage University must comply with all applicable laws, regulations, and provisions outlined within a contract or grant. To ensure compliance with Federal awards, Heritage University will perform post award procedures in compliance with the Uniform Grants Guidance and agency specific requirements.

1. No grant funds shall be disbursed until the authorized signatory have approved the acceptance of the award on behalf of the University, the budget has been submitted and entered into the financial software by the Business Office, an award letter has been received from the awarding agency, and a project and fund source established in the accounting records.
2. Modifications to the budget associated with a grant-funded project in such a way that alters the grant amount or moves funds from one budget line item to another must adhere to grantor requirements.
3. Grant funds awarded to the University shall not be used to supplant an existing expense so that current funds can be diverted to another use unless such use of grant funds is explicitly identified as allowable in writing by the granting entity in the grant award.
4. All income resulting from a grant-funded project or program shall adhere to University policy and procedures and be managed and maintained as established in the award letter, grant agreement, contract, special conditions, or other document generated by the granting entity. Federal grants that generate revenue must follow federal policies and will be tracked for compliance with such regulations.
5. All procurement activity associated with grant-funded projects or programs shall follow the procedures outlined in University's Procurement Policy.
6. All property acquired through grant funds shall be subject to the University's Procurement Policy as well as restrictions and/or requirements set forth within the terms of the grant, including any applicable federal rules or regulations.
7. All grant and any related matching fund revenues and expenditures shall be recorded in the grant fund source/project. Any revenues or expenditures that occur in another program/project that are applicable to a grant or that are used as a match shall have a journal entry (JE) made to put the revenues or expenditures in the appropriate grant project with a detailed explanation, including original G/L date and batch information.

8. Transfers of costs to any federally funded award account will be allowable only where there is a direct benefit to the federal grant account being charged. For example, an overdraft of any direct cost item incurred in the conduct of one sponsored project may not be transferred to another sponsored project account merely for the sake of resolving a deficit or an allowability issue. Cost transfers will not be used as a means of managing awards.
9. PMs/PIs with assistance from the Grants Manager are ultimately responsible for adherence to the stipulations outlined in the approved grant award/contract to ensure that allowable expenditures are incurred.

## Grant Administration

### Management & Reporting

The PM/PI oversees fiscal and programmatic performance, is responsible for the overall management of the grant, and must partner with the Grants Manager to ensure compliance with applicable federal, state, and/or local regulations. These expectations include completion of all required reports and submission of all in-house documentation (i.e., requests to transfer funds, personnel requisitions, and budget modifications).

All grant project expenses need to be approved by the PM/PI in advance. If the project spending is related to any reimbursement to the PM/PI, the request must have VPAF approval. All expenses and cost transfers should be well-documented and filed.

The PM/PI and Grants Manager are responsible for complying with the grantor and Heritage University's policies and guidelines including training, effort reporting, inventory reporting, and periodic program and financial reports. Failure to meet deadlines can have a serious impact on the funding stream and future funding possibilities and, in some cases, it can hold up awards of future potential grants to Heritage University.

The Grants Manager will record milestone dates and programmatic/performance report deadline(s) stated in the contract within the Grant Intake Form ([Appendix II](#)) and the Grant Tracker. (The Grant Tracker is maintained by the Grants Manager based off of the information on the Grant Intake Form). The Grants Manager will assist in setting up meetings and reviewing the process to track all related key tasks and answer all project related questions.

If adjustments to the original proposal are necessary, the PM/PI must discuss the plan of action with the Grants Manager and get the prior approval from the VPAF before communicating with the funding agency. Such adjustments would typically include budget revisions, changes to the project scope of work, emergency situations (e.g., natural disasters, pandemics, etc.) and so on. When requesting a major revision, the PM/PI should represent Heritage University and communicate with the funding agency. Correspondence regarding major changes will be reviewed and approved by the VPAF.

If budget modifications are required, the PM/PI should prepare a revised budget. The Grant Manager should be included to assist with any grant agreement or contract modifications. The final budget modification should be submitted to the VPAF and then the authorized signatory for approval. Following the review and approval, the revised budget will be submitted, if required, to the sponsoring organization for their review and approval. Once approval of the budget modification is received, the Business Office will update the budget in the finance software. (See section on Award Extension for information on No Cost Extensions)

The PM/PI supported by the Grants Manager should review budget to actuals and expenditure detail reports on a quarterly basis and/or prior to any financial reporting to ensure that costs are reasonable, allowable, and allocable (See Allowable Cost section). Any changes should be communicated to the Business Office immediately. The reviewed reports should be signed, time stamped, and stored in the Master Grant File.

## Allowable Costs

This section is issued to define the appropriate charging of costs, consistent with Subpart E of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (the Uniform Guidance) as implemented by the applicable federal agencies.

- All costs charged to a federal award will be approved by someone with knowledge of Subpart E of the Uniform Guidance, applicable federal program statutes and limitations included in the federal award's terms and conditions.
- Under federal regulations and award requirements, departmental types of expenses including but not limited to administrative or clerical salaries, office supplies, postage, local telephone costs, photocopy costs, network charges, cell phones, etc. should normally be treated as Indirect Costs and recovered as such. These costs normally have been incurred for a common or joint objective and cannot be reasonably identified with a particular final cost objective. The University's applied cost allocation must be consistent with the cost allocation practices negotiated as part of the University's indirect cost rate methodology as approved by the US Department of Health and Human Services.
- The PM/PI in coordination with the Grants Manager will secure approval in writing from the federal funding agency prior to incurring any costs that require prior approval per the award.
- If a cost requiring prior approval is explicitly included in the budget of the award, approval of the budget constitutes approval of those costs.
- As further described in the Allowable Cost Guide for Federal Awards, costs charged to a federally funded project must be reasonable and necessary, allocable, consistently treated, properly supported, and conform to any limits or exclusions.

All direct costs charged to a Federal sponsored program must be necessary, reasonable, and allocable to the program and be incurred within the limitations set out by the sponsored award

document and sponsor specific requirements, which may include seeking approval prior to charging certain costs to the award.

Any cost that is considered an indirect cost, such as administrative or clerical services, cannot be directly charged to a federally funded sponsored program unless certain conditions are met to justify the direct charging of the cost and prior sponsor approval is sought and obtained, consistent with the sponsor's definition of prior approval.

Any costs that are proposed or incurred as cost-share in support of the sponsored program must also follow these cost principles.

### **Direct Costs**

Direct costs are those costs that can be identified specifically with a particular final cost objective, such, as a Grant/award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy (2 CFR Part 200.413(a)). Heritage University identifies and charges these costs exclusively to each award or program.

Each invoice shall be coded with the appropriate account number reflecting which program received direct benefit from the expenditure. Invoices are approved following the appropriate workflow in Heritage University's purchasing process.

### **Criteria for Allowability**

All costs must meet the following criteria from 2 CFR Part 200.402 - 411, Basic Considerations, in order to be treated as allowable direct or indirect costs under a grant/award:

1. The cost must be "reasonable" for the performance of the award, considering the following factors:
  - a. Whether the cost is of a type that is generally considered as being necessary for the operation of Heritage University or the performance of the award.
  - b. Restraints imposed by such factors as generally accepted sound business practices, arm's length bargaining, federal and state laws and regulations, and the terms and conditions of the award.
  - c. Whether the individuals concerned acted with prudence in the circumstances.
  - d. Consistency with established policies and procedures of Heritage University, deviations from which could unjustifiably increase the costs of the award.
2. The cost must be "allocable" to an award by meeting one of the following criteria:
  - a. The cost is incurred specifically for a grant/award,
  - b. The cost benefits both the grant/award and other work and can be distributed in reasonable proportion to the benefits received, or
  - c. The cost is necessary to the overall operation of Heritage University,

except where a direct relationship to any program or group of programs cannot be demonstrated.

3. The cost must conform to any limitations or exclusions of 2 CFR Part 200 Subpart E Cost Principles, or the grant/award itself.
4. Treatment of costs must be consistent with policies and procedures that apply to both federally financed activities and other activities of Heritage University.
5. Costs must be consistently treated over time.
6. The cost must be determined in accordance with generally accepted Grants & Compliance principles (GAAP).
7. Costs may not be included as a cost of any other federally financed program in the current or prior periods.
8. The cost must be adequately documented in accordance with Heritage University's record retention policy.

### **Segregating Unallowable from Allowable Costs**

The following steps shall be taken to identify and segregate costs that are allowable and unallowable with respect to each grant/award:

1. The budget and grantor contract for each award shall be reviewed for costs specifically allowable or unallowable.
  - a. Grant managers and Grants & Compliance personnel shall be familiar with the allowability of costs provisions 2 CFR Part 200.400 - 476, Cost Principles, particularly: The list of specifically unallowable costs found in 200.420 - 476, Selected Items of Cost, such as alcoholic beverages, bad debts, contributions, fines, and penalties, etc.
    - i. Unallowable costs also include a prohibition on telecommunications and video surveillance services/equipment (per 200.216 and 200.471) produced in whole or with parts by Huawei Technologies Company or ZTE Corporation.
  - b. Grant managers and any staff assisting in the administration of a Federal award shall be familiar with those costs requiring advance approval from funding agencies to be allowable in accordance with 2 CFR Part 200.407, Prior Written Approval, such as participant support costs, equipment purchases, etc.
2. No costs shall be charged directly to any grant/award until the cost has been determined to be allowable under the terms of the award and/or 2 CFR Part 200.400 - 476, Cost Principles.
3. For each grant/award, an appropriate set of general ledger accounts (or account segments) shall be established in the chart of accounts to reflect the categories of allowable costs identified in the award or the award budget.
4. All items of miscellaneous income or credits, including the subsequent write-offs of uncashed checks, rebates, refunds, and similar items, shall be reflected for grants and compliance purposes as reductions in allowable expenditures if the credit relates to charges that were originally charged to a grant/award or to activity associated with a grant/award. The reduction in expenditures shall be reflected in the year in which the credit is received (i.e., if the purchase that results in the credit took place in a prior period, the prior period shall not be amended for the credit).

## **Distribution of Costs Across Two or More Sponsored Programs**

§200.405 of the Uniform Guidance governs allocable costs, including subsections (c) and (d) which deal with allocable costs that benefit two or more projects. Allocating costs cannot be based on overcoming funding deficiencies, to avoid restrictions based upon statutes, regulations or award terms and conditions, or for reasons of convenience.

Costs that benefit two or more projects should be allocated based upon proportional benefit. That is, the cost is allocated according to the proportion of benefit provided to each project. For example, the cost of lab supplies might be allocated based upon the quantity used (or planned to be used) on each project. If the proportions of benefit cannot be determined because of the interrelationship of the work involved, the cost is distributed on any reasonable basis. For example, the cost of lab supplies might be allocated based upon the allocation of employee salaries to each project.

## **Compensation**

Compensation paid or accrued by the organization for employees working on a Federal award during the grant period is allowable, in accordance with HU policy outlined in the Employee Handbook and 2 CFR §200.430, and §200.431.

## **Salaries and Wages**

For Institutions of Higher Education, additional allowable salary and wages cost considerations include the following:

- Allowable activities. Charges to Federal awards may include reasonable amounts for activities contributing and directly related to work under an agreement, such as delivering special lectures about specific aspects of the ongoing activity, writing reports and articles, developing and maintaining protocols (human, animals, etc.), managing substances/chemicals, managing and securing project-specific data, coordinating research subjects, participating in appropriate seminars, consulting with colleagues and graduate students, and attending meetings and conferences.
- Incidental activities. Incidental activities for which supplemental compensation is allowable under written institutional policy (at a rate not to exceed institutional base salary) need not be included in the records described in paragraph (i) of this section to directly charge payments of incidental activities, such activities must either be specifically provided for in the Federal award budget or receive prior written approval by the Federal awarding agency.
- Salary basis. Charges for work performed on Federal awards by faculty members during the academic year are allowable at the Institutional Base

Salary (IBS) rate. Except as noted in the incidental activities section, in no event will charges to Federal awards, irrespective of the basis of computation, exceed the proportionate share of the IBS for that period. This principle applies to all members of faculty at an institution. IBS is defined as the annual compensation paid by an Institution of Higher Education (IHE) for an individual's appointment, whether that individual's time is spent on research, instruction, administration, or other activities. IBS excludes any income that an individual earns outside of duties performed for the IHE. Unless there is prior approval by the Federal awarding agency, charges of a faculty member's salary to a Federal award must not exceed the proportionate share of the IBS for the period during which the faculty member worked on the award.

- Intra-Institution of Higher Education consulting by faculty should be undertaken as an IHE responsibility requiring no compensation in addition to IBS. However, in unusual cases where consultation is across departmental lines or involves a separate or remote operation, and the work performed by the faculty member is in addition to his or her regular responsibilities, any charges for such work representing additional compensation above IBS are allowable provided that such consulting arrangements are specifically provided for in the Federal award or approved in writing by the Federal awarding agency.
- Overload Pay. Normally represents overload compensation, subject to institutional compensation policies for services above and beyond IBS. Where extra service pay is a result of Intra-IHE consulting, it is subject to the same requirements of the first paragraph above on Allowable Activities . It is allowable when in compliance with HU's Compensation Policy.
- Salary rates for non-faculty members. Non-faculty full-time professional personnel may also earn "overload pay" in accordance with HU's written policy and consistent with the first bullet point in this section.
- Periods outside the academic year. Except as specified for teaching activity, charges for work performed by faculty members on Federal awards during periods not included in the base salary period will be at a rate not in excess of the IBS and based on HU's Compensation Policy.
- Part-time faculty. Charges for work performed on Federal awards by faculty members having only part-time appointments will be determined at a rate not in excess of that regularly paid for part-time assignments.
- Educational leave. Costs are allowable in accordance with HU's written policies provided that the staff are engaged in instruction or research. Such costs will be allocated on an equitable basis among all related activities within HU.

## **Fringe Benefits**

For Institutions of Higher Education, additional allowable fringe benefit cost considerations include the following:

- Fringe benefits in the form of undergraduate and graduate tuition or remission of tuition for individual employees are allowable, provided such benefits are granted in accordance with established HU policies.
  - **Tuition benefits for family members other than the employee are unallowable.**
  - Fringe benefits in the form of tuition or remission of tuition for individual employees not employed by HU are limited to the tax-free amount allowed per section 127 of the Internal Revenue Code as amended.

## **Effort Reporting**

Compensation costs charged to Federal awards must meet the Standards for Documentation of Personnel Expenses as detailed at 2 CFR Part 200.430(i). The following provisions are applicable to all payroll costs charged directly to Federal award programs in whole or in part:

- Charges to awards for salaries and wages, whether treated as direct costs or indirect costs, are based on documented payrolls.
- Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards
- The distribution of salaries and wages to awards is supported by monthly time sheets that are signed by the employee or their supervisor.
- Time sheets reflect the after-the-fact determination of the actual activity of each employee.
- Time sheets are reviewed by the PM/PI and the Controller to ensure proper effort has been reported.
- In accordance with Department of Labor regulations implementing the Fair Labor Standards Act (FLSA) (29 CFR part 516), charges for the salaries and wages of nonexempt employees, in addition to the supporting documentation described in this section, must also be supported by records indicating the total number of hours worked each day

## **Subrecipient Monitoring**

The Uniform Guidance section 200.331 requires prime recipients of federal funds to monitor subawards to ensure subrecipients meet the audit requirements and use funds in accordance with applicable laws, regulations, and terms of the award.

This section applies to all subawards issued under both Federal and Non-Federal sponsored programs made. This section does not apply to professional services and consultant agreements or the procurement of goods or services from contractors.

The University is responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure proper stewardship of sponsored funds. This section addresses institutional responsibilities and assists PMs/PIs and staff in ensuring that, in addition to achieving performance goals, subrecipients comply with Federal laws and regulations and with the provisions of any agreements that govern the subaward.

The University's responsibilities include:

- Performing and documenting the Subrecipient vs. Contractor determination using the AGA Subrecipient vs. Contractor Determination Checklist ([Appendix III](#)).
- Develop and submit for approval the Subaward Agreement ensuring that all terms required by 2 CFR Part 200.332(a) are included
- Evaluating and documenting the Subrecipient Risk Assessment to determine the appropriate level of monitoring. Generally, the Subrecipient Risk Assessment should be performed before each subaward is made.
- Ensuring that federal funds are used for authorized purposes in accordance with Federal statutes, regulations, and the terms and conditions of the subaward
- Reviewing financial and programmatic reports to ensure proper stewardship of sponsor funds
- Conducting on-going review of activities and overseeing subrecipient progress to ensure performance goals (scope of work or specific aims) are achieved
- Verifying that subrecipient is audited as required by audit requirements in Uniform Guidance
- Issuing management decisions on audit findings directly related to prime awards, after receipt of the subrecipient's audit report, and ensuring that subrecipients take appropriate and timely corrective action

Subrecipient monitoring responsibilities are shared among the following:

The PM/PI have the primary responsibility of monitoring subrecipients' progress and ensuring compliance with Federal regulations and the award terms and conditions of the subrecipient.

Grants Manager assists PM/PI in their monitoring responsibilities, reviewing subrecipient invoices, ensuring timely receipt of programmatic reports, identifying and following up on questioned expenditures, if necessary, and maintaining documentation of all monitoring efforts.

The Business Office reviews and approves certain high risk subrecipients at the proposal stage and as necessary during the life of the award; ensure that the Organization's subrecipient monitoring policies and procedures comply with federal and other applicable regulations and are applied consistently; and regularly review subrecipient risk assessments, develop monitoring plans, and review results of subrecipient findings, corrective action plans, and other issues brought to their attention. They will also provide training and guidance on interpreting regulations and subrecipient award terms and conditions.

## Subrecipient Monitoring Procedures

The University takes a risk-based approach to subrecipient monitoring, focusing monitoring efforts more frequently on those subrecipients who are deemed to pose a greater risk for potential non-compliance. Subawards should be very carefully monitored, detailed expectations should be documented, and the PM/PI should ensure that they have adequate time allocated to monitor the activities.

PM/PI should use the following subrecipient monitoring procedures when appropriate:

- The PM/PI should communicate regularly with subrecipient and review progress/programmatic reports or other specified deliverables on a timely basis to ensure the subaward funds are being used for authorized purposes and that performance goals are being achieved. Any issues should be investigated, documented, and resolved by the PM/PI and Grants Manager.
- The Grants Manager should monitor receipt of progress/programmatic reports or other deliverables for timeliness.
- The PM/PI and/or Grants Manager should perform an expense to budget comparison for cost- reimbursement subawards. The subrecipient's invoices are generally required to show both current period and cumulative expenses.
- The PM/PI and/or Grants Manager are responsible for reviewing and documenting the review of financial reports and invoices received from the subrecipient to ensure that they follow Federal statutes, regulations, and the terms and conditions of the subaward. The Checklist ([Appendix IV](#)) should be used as a guide for reviewing subrecipient invoices.
- The PM/PI and/or Grants Manager are responsible for verifying that the subrecipient is adequately meeting any cost sharing commitments made under the terms of the subaward and that the subrecipient's indirect costs as charged follow the indirect cost rate specified in the subaward.
- The Grants Manager should request that the subrecipient provide clarification of invoiced charges that appear unusual, excessive, or otherwise questionable. The Grants Manager may request detailed justification to verify the costs are allowable.
- Subrecipients not subject to the Audit Requirements in the Uniform Guidance (non-federal entities that expend less than \$750,000 in Federal awards during their fiscal year) may require additional monitoring to ensure compliance. For subrecipients identified as requiring closer scrutiny, The PM/PI and/or Grants Manager should work with the Business Office to establish additional channels of communication and monitoring method. Subrecipient monitoring plans should be developed as appropriate. Examples of additional monitoring steps include the following:

- Imposing restriction on budget categories, rebudgeting and carry forward of funds
  - Requiring more detailed financial reports
  - Requesting Payroll records
  - Reimbursement based upon receipt of detailed invoices with supporting back up documentation
  - Conducting site visits to review administrative operations, observe programmatic operations and project performance
- The PM/PI should communicate with the Business Office regarding any change in expectations of performance of work, payment terms, change in key personnel, reporting requirements, budgeting, deliverables, etc. If work stops or a change in the scope of work results, the Business Office should be notified, and appropriate agreement changes implemented.
  - The Business Office should use the following subrecipient monitoring procedures contacting the PM/PI and/or Grants Manager, when appropriate:
    - Prior to issuing a subaward, a risk assessment of the subrecipient will be performed to determine what measures (e.g., additional monitoring procedures, special terms and conditions) need to be taken to establish appropriate monitoring procedures. (See [Appendix V](#): Subrecipient Risk Assessment.)
  - Ensure that all subrecipients and their principals have not been debarred or suspended by including the following certification clause in all subaward agreements:

**Debarment, Suspension, and Other Responsibility Matters (2 CFR 200.214 and 2 CFR 180)**

By signing this Subaward, the Subrecipient Authorized Official certifies, to the best of his/her knowledge and belief that neither the Subrecipient nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from participation in this transaction by any federal department or agency, in accordance with 2 CFR 200.213 and 2 CFR 180.

- For subrecipients deemed to require closer monitoring, the University may impose additional award conditions as needed. The award conditions may include the following:
  - Not allowing advance payments
  - Withholding authority to proceed to the next phase until evidence of acceptable performance within a given period of performance is received
  - Requiring additional, more detailed financial reports

- Requiring additional project monitoring
- Requiring attendance at technical or management assistance training
- Establishing additional prior approvals.

The Business Office should use the following subrecipient monitoring procedures contacting the PM/PI and/or Grants Manager, when appropriate:

- The PM/PI is responsible for reviewing and signing invoices received from the subrecipient to ensure that they are in compliance with Federal statutes, regulations, and the terms and conditions of the subaward. The Subrecipient Invoice Checklist ([Appendix IV](#)) should be used as a guide for reviewing invoices.
- PM/PI and Grants Manager will verify that subrecipients if applicable, are audited as required by the Audit Requirements in the Uniform Guidance and will review the subrecipients' audit reports to assess audit findings, if any. (See [Appendix VI](#): Subrecipient Monitoring Form.)
- The Grants Manager and Business Office will issue a management decision for audit findings that relate to awards the University makes to subrecipients and must do so within six months of acceptance of the audit report by the FAC.
- The Grants Manager and Business Office are responsible following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies provided to the subrecipient directly related to the University's prime awards detected through audits, on-site reviews, and other means.
- The Grants Manager and Business Office will provide training and guidance in interpreting regulations and subrecipient award terms and conditions.

## **Programmatic Reporting and Reimbursement**

Grants awarded to the University may require that progress, programmatic and financial reports be submitted to the grantor. Accurate and timely reporting is critical to maintaining a good relationship with the grantor. Late or inaccurate reports may negatively impact current or future funding.

### **Grant Reporting Procedure**

- a) Recipient departments must prepare timely and accurate progress or programmatic reports as required by grantor.

- b) The Grants Accountant shall submit all financial reports, grant budget adjustments, and reimbursement requests to the Controller for review and approval before submitting them to the grantor. Annual and final reports must be reviewed and submitted by the VPAF. The Business Office will address any issues with the PM/PI and Grants Manager.
- c) All reports must be stored in the Master Grant File. Financial reports must include support or reconciliation to the general ledger.
- d) Programmatic reports shall be submitted to the Grants Manager. The Grants Manager will review any programmatic reports for content and quality and address any issues with the PM/PI. Upon satisfaction with the report, the PM/PI will submit the report and place a copy of the report in the Master Grant File.

## Cash Management

Heritage University will ensure that requests for payments occur only when essential to meet the needs of the organization's actual disbursements.

1. **Timing of Payments.** Advance payments will be consolidated and limited to the minimum amounts needed. The timing of advanced payments will be in accordance with Heritage University's actual and immediate cash requirements necessary to carry out the purpose of the approved program or project. The timing and amount of advance payments will be as close as is administratively practicable to the actual disbursements for direct program or project costs and the proportionate share of any allowable indirect costs (F&A).

### Reimbursement Payment Method

For reimbursements of federal funds, Heritage University will:

- A. Monitor the fiscal activity (payments and reimbursements) under each grant on a continuous basis and request timely reimbursement only for expenditures that have already been disbursed and comply with all applicable award requirements.
- B. Maintain source documentation/accounting records that reconcile to the reimbursement request at a level adequate to establish that funds have not been used in violation of any applicable statutory restrictions or prohibitions.
- C. If Heritage University transfers expenditures previously charged to a federal award for which reimbursement has been claimed to a non-federal fund source, Heritage University will calculate the interest earned on the federal funds pursuant to possible submittal - refer to Interest Earned section below.

### Advance Payment Method

For advances of federal funds, Heritage University will:

- A. Monitor the fiscal activity (drawdowns and payments) under each grant on a continuous

basis and maintain source documentation/accounting records at a level adequate to establish that funds have not been used in violation of any applicable statutory restrictions or prohibitions.

- B. To the extent available, disburse funds available from program income, rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments.
- C. Plan for cash flow in the grant project during the budget period and review project cash requirements before each drawdown.
- D. Draw down only the amount of funds necessary to meet the immediate needs of the program/project (including the proportionate share of any allowable indirect costs) and minimize the time between receiving and disbursing those funds.
- E. Pay out federal funds for expenditures that comply with all applicable grant requirements as soon as administratively feasible (a rule of thumb is no more than three business days after receiving the funds).
- F. Deposit advance payments into insured accounts whenever possible. Unless conditions listed in CFR Title 2 Part 200 Subpart D §200.305(b)(8) apply, Heritage University will maintain advance payments in interest-bearing accounts.
- G. Remit interest earned over \$500 annually – refer to Interest Earned section below.

#### Interest Earned

- A. Heritage University will retain interest earned amounts up to \$500 per year for administrative expenses.
  - B. Any additional interest earned on those funds will be remitted annually to the Department of Health and Human Services (HHS) Payment Management System (PMS) through an electronic medium or by check to the HHS Program Support Center. Heritage University will refer to the federal or pass-through agency for pertinent information about the remittance.
2. **Payments to Subrecipients and Contractors.** Payments made by Heritage University to subrecipients, and contractors shall conform to the same standards of timing and amount as apply to payments by the Federal grantor. These funds shall be disbursed to the subrecipient within a reasonable period of time, generally 3-5 days.
  3. **Safeguarding Funds** Heritage University's accounting system and financial policies and procedures ensure that grantor funds will not be commingled with the personal funds of, or be used for personal purposes by, any officer, employee, or agent of Heritage University; nor will any of these funds be deposited in personal bank accounts for disbursement by personal check. Heritage University will also ensure that all advance payments are maintained in interest-bearing bank accounts as outlined in 2 CFR § 200.305.

## Request for Payment

Upon receipt of a Federal award, Heritage University will register, as instructed, in the grantor's payment management system. Appropriate staff in the Business Office will have access to the system to draw down disbursements on behalf of the organization. Award level detail will be supplied at the time of the payment request. Requests for payments will be conducted in accordance with the terms and conditions of the award and the Uniform Grant Guidance. When performing payment requests in advance of costs incurred, Heritage University will ensure that:

1. Funds for the project period have been obligated in the form of an electronically signed grant;
2. The payment request is in line with Heritage University written procedures that minimize the time elapsing between the transfer of funds from the U.S. Treasury and their disbursement, unless otherwise allowed by the funding agency;
3. Cash-on-hand (e.g., program income) is used before requesting an advanced payment;
4. That upon receipt, the funds are identified and recorded in the financial management system in a manner that meets the standards for fund control and accountability prescribed in 2 CFR § 200.302; and
5. **Erroneous Payments:** Advances or reimbursements made in error or in excess of immediate cash needs will be refunded to the grantor immediately following the guidance of the Federal Agency.

## File Management, Access, and Retention

The Grants Manager and/or the VPAF or their designee may review the files, activities, equipment, and facilities, and interview relevant personnel and contracted entities of any University project or program that is funded with grants awarded to the University.

## File Management Procedure

The Master Grant File must be located on a shared drive for reference by the PM/PI, Grants Manager, and Business Office and shall be maintained by the Grants Manager. The digital file should include:

- Pre-award documents (all grant proposals or applications),
- Applicable rules and regulations for the funding source,
- Post award documents (award letter, grant agreement, memoranda of understanding, contracts, programmatic and financial reports, grantor communications, grant, and budget modifications, monitoring efforts etc.), and
- Close-out documentation.

All department and Master Grant Files associated with a grant award must maintain a file structure that includes, at minimum, the following four sections

with clear separations between different fiscal years, unless otherwise directed by the grantor:

- a.) **Application or Proposal** (e.g., application guidance, a copy of the application and research including statistical information used in preparation of and support of the grant)
- b.) **Award Documents** (e.g., award letter, University agenda item, grant agreement, grant amendments, modifications, extensions, cancellations and terminations and anything else related to the award)
- c.) **Finance** (e.g., account set up, purchase orders, invoices, reimbursement requests)
- d.) **Programmatic & Financial Reports** (e.g., reports to granting entity and evaluation components)

#### File Retention Procedure

The University maintains its programmatic records for at least three years following the closure date of the grant award. Accounting records are maintained for at least five years following the closure of its most recent audit report. If any litigation, claim, negotiation, audit, or other action involving grant records has been started before the expiration of the five- year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular five-year period, whichever is later.

- a) Grantors may require retention periods in excess of five years. Departments must ensure they comply with retention requirements specified by each grantor. Retention requirements extend to books of original entry, source documents supporting accounting transactions, the general ledger, subsidiary ledgers, personnel, and payroll records, cancelled checks, and related documents and records.
- b) Source documents include copies of all awards, applications, and required recipient financial and narrative reports. Personnel and payroll records shall include time and attendance reports; personal activity reports or equivalent documentation for all individuals reimbursed under the award.
- c) Recipient departments are also obligated to protect records adequately against loss, theft, fire, or other damage in accordance with statutory provisions.

## Grant Closeout

### Closeout Timeline

Heritage University will follow the closeout procedures described in 2 CFR 200.344, Closeout, and in compliance with grantor specific guidance as outlined the grant agreement. Heritage University will complete closeout procedures within 120 days for direct Federal awards and, typically, within 90 days for pass-through Federal awards of the end of the grant or contract agreement. Heritage University will ensure that subrecipients liquidate all obligations incurred within 90 days of the end of the grant or contract agreement.

The Grants Manager and the PM/PI will meet 90 days before the end of the award to review expenditures and performance under the award. Final expenditures to be made under the award should be planned and obligated to the award well in advance of the end of the close out period.

If award activities will be finalized by the end date, the Grants Manager and the PM/PI will follow the tasks outlined in the Grant Closeout Checklist ([Appendix VII](#)) to ensure that the award is closed within 120 days of the end of the grant or contract agreement. All closeout documentation will be stored in the grant file for the required period of time.

### Award Extensions

If award activities will not be complete by the award end date, as identified in the grant agreement, the Grants Manager and the PM/PI, will complete the steps outlined by the grantor to request the appropriate extension. The extension must be reviewed and authorized by the VPAF before submission.

A one-time No Cost Extension of the end date of the grant for up to 12 months may be requested by the grantor with HU approval if additional time beyond the established end date is required to assure adequate completion of the original scope of work within the funds already made available. This one-time extension may not be exercised merely for the purpose of using the unliquidated balances. Heritage University should refer to the Federal agency's guidance for submitting notifications of one-time extensions and complete within the period of time specified.

### Real and Personal Property

Heritage University must account for any real and personal property acquired with Federal funds or received from the Federal Government in accordance with Heritage University's separate Equipment Management policy including review of award terms and conditions for property disposition instructions, when applicable.

### Financial Management System Closeout

Upon completion of the grant term of each grant award, the PM/PI shall alert the Business office to place the grant's fund source and/or project in a no posting status.

- a. Upon completion of the grant period of each grant, the PM/PI must notify the Business Office and the Grants Manager. Communication must include the name of the grant, the project number and describes the final disposition of the funds and required activities.
- b. Upon review of the communication and satisfaction of any discrepancies, the Business Office will update the accounting system and confirm grant closeout with the Grants Manager and PM/PI.
- c. The grant closeout communication shall be placed in the Master Grant File.

#### Post Closeout Adjustments

Terms and conditions of the award and Federal agency policy should be referenced for purposes of reporting upward and downward adjustments to Federal awards after financial closeout has been performed.

# Appendix I: Grants & Contracts Approval for Application Routing Form

Heritage University

## GRANTS & CONTRACTS APPROVAL FOR APPLICATION ROUTING FORM

*When routing the grant proposal, please include the notice of funding opportunity or invitation to apply with the grant proposal and routing form.*

All proposals for external grants and contracts must have the appropriate signatures as indicated below, preferably four weeks prior to the deadline for submission. The Provost (or VPSA OR VPAMA) is the last person to sign the Routing Form which gives the Program Manager/ Principal Investigator PM/PI approval to submit the proposal to the funding agency.

Assistance with proposal development is available through the Grants Manager. The Grants Manager should be contacted as soon as a funding opportunity is identified.

Funding Agency: \_\_\_\_\_

State  Federal  Foundation  Corporation  Other: \_\_\_\_\_

Submission Date: \_\_\_\_\_ Method:  Electronic  Mail Other: \_\_\_\_\_

Type:  New  Continuing  Sub grant  Supplement Other: \_\_\_\_\_

Project Title: \_\_\_\_\_

Project Purpose & Benefit to the mission of the University:  
 \_\_\_\_\_  
 \_\_\_\_\_

Specific Resources needed to implement the grant:  
 HR  IT  IRB  Library Services  Other: \_\_\_\_\_

Amount Requested \$ \_\_\_\_\_ Notification Date (Approximate): \_\_\_\_\_

Allowable IDC Rate Under the Award: \_\_\_\_\_

Project Timeline: Start \_\_\_\_\_ Finish \_\_\_\_\_ Department/Area \_\_\_\_\_

<u>Approvals</u>	<u>Signature</u>	<u>Date</u>
Program Manager/Principal Investigator	<small>PRINT NAME</small> _____	_____
Department Director (if different than PM/PI)	<small>PRINT NAME</small> _____	_____
Grants Manager	<small>PRINT NAME</small> _____	_____
Vice President of Administration and Finance	<small>PRINT NAME</small> _____	_____
Authorized Signatory on behalf of University	<small>PRINT NAME</small> _____	_____

Administrative Use Only			
		Date	Comments:
<input type="checkbox"/>	Approved	_____	
<input type="checkbox"/>	Denied	_____	

Grants and Proposal Routing Form  
January 2022

# Appendix II: Grant Intake Form

Grant and Contract Information		
Award Number	<input style="width: 100%;" type="text"/>	
Award Name	<input style="width: 100%;" type="text"/>	
Grantor	<input style="width: 100%;" type="text"/>	
Federal awarding agency (if applicable)	<input style="width: 100%;" type="text"/>	
Award period		
From	<input style="width: 100%;" type="text"/>	
To	<input style="width: 100%;" type="text"/>	
Applicable laws and regulations (federal, state, local, other) - mark one		
Uniform Guidance	<input type="checkbox"/>	Yes
Federal Acquisition Regulations	<input type="checkbox"/>	No
State and local government	<input type="checkbox"/>	No
Other (specify)	<input style="width: 100%;" type="text"/>	
Assistance Listing Number - CFDA (if applicable)	<input style="width: 100%;" type="text"/>	
<b>Reporting Requirements</b>	<b>Frequency</b>	<b>Data Requirements</b>
Financial	Monthly	
Programmatic	Quarterly	
Other		
Federal Funding Determination		
	Yes/No	Explain
1. Does the agreement reference a Federal Program Name and/or include an Assistance Listing number (previously CFDA number)?	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
2. Does the agreement reference federal regulations (Uniform Guidance, Federal Acquisition Regulations, etc.) as being the applicable regulations?	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
<i>If either question 1 or 2 are answered yes, this is an indication that the award is funded with federal funds, but may require documented follow up with the pass through agency for a final determination. If considered to be federal funded, proceed below.</i>		
3. Does the award agreement specifically identify the organization as being a Contractor or Subrecipient and, if not, has follow up been performed with the pass-through entity for the determination in order to ensure proper inclusion/exclusion from the Schedule of Expenditures of Federal Awards (SEFA) reporting?	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
<i>If the organization is considered a contractor, in accordance with the Uniform Guidance [2 CFR Part 200], the award is not considered federal assistance for purposes of the Schedule of Expenditures of Federal Awards and is if the organization is considered a subrecipient.</i>		
<i>The Uniform Guidance places the responsibility for this determination with the pass-through entity with the Uniform Guidance identifying characteristics of a subrecipient and a contractor.</i>		
4. Is the grant or contract considered federal assistance and required to be reported on the SEFA?	<input type="checkbox"/>	
Significant Compliance Requirements		
<i>Review the grant agreement, Part 4 of the recent OMB Compliance Supplement (if available for the particular program) and other knowledge of the program activities and document below which of the compliance requirements apply to the program. Provide additional information on the specific requirements as needed for tracking purposes. See Part 3.2 of the recent OMB Compliance Supplement for a further discussion of each of the compliance requirements listed below.</i>		
	Applicable?	Additional Compliance Information
Allowable Costs	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Cash Management	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Davis Bacon Act	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Eligibility	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Equipment & Real Property Management	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Matching, Level of Effort, Earmarking	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Period of Availability of Federal Funds	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Procurement, Suspension & Debarment	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Program Income	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Reporting including applicability of the Federal Funding Accountability and Transparency Act (FFATA)	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Subrecipient Monitoring	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>
Special Tests & Provisions	<input type="checkbox"/>	<input style="width: 100%;" type="text"/>

# Appendix III: AGA Subrecipient-Contractor Checklist

CHARACTERISTICS	EXPLANATIONS				
Decision Making Authority					
<p><b>200.330 a. 1</b> Determines who is eligible to receive what Federal assistance;</p> <p>a. Does the entity determine who is eligible to participate in the federal program? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>200.330 a.3</b> Has responsibility for programmatic decision making;</p> <p>a. Does the entity have the ability to make decisions about how services will be delivered to participants, in accordance with federal programmatic requirements? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p style="text-align: center;"><b>OR</b></p> <p><b>200.330 b.4</b> Provides goods or services that are ancillary to the operation of the Federal program;</p> <p>b. Does the entity provide goods or services for the recipient's own use? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>b. Does the entity provide services designated by the recipient to serve the recipient's participants without regard to specific federal programmatic requirements? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If you selected "yes" to <b>EITHER</b> item <b>a</b>, this is an indicator of a subrecipient relationship. If you selected "yes" to <b>EITHER</b> item <b>b</b>, this is an indicator of a contractor relationship.</p>	<p>If the entity determines whether a participant meets a federal program's eligibility requirements for assistance, it is most likely a subrecipient.</p> <p>A contractor may provide services to clients in a program after eligibility has been determined by the recipient.</p> <p>If the entity has authority to make decisions regarding the delivery of service, operations, or types of assistance provided within the terms of the agreement, it is typically a subrecipient.</p> <p>If the entity provides goods or services directly to the recipient or to program participants at the direction of the recipient and does not make programmatic decisions or adhere to program requirements, it is typically a contractor.</p> <table border="1" style="width: 100%; text-align: center;"> <tr> <td style="background-color: #1a3d4d; color: white;">Subrecipient</td> <td style="background-color: #1a3d4d; color: white;">Contractor</td> </tr> <tr> <td style="background-color: #d9d9d9;"><input type="checkbox"/></td> <td style="background-color: #d9d9d9;"><input type="checkbox"/></td> </tr> </table>	Subrecipient	Contractor	<input type="checkbox"/>	<input type="checkbox"/>
Subrecipient	Contractor				
<input type="checkbox"/>	<input type="checkbox"/>				
Nature of Award	EXPLANATIONS				
<p><b>200.330 a. 2</b> Has its performance measured in relation to whether objectives of a federal program were met;</p> <p>a. Are the scope of work (or portion, if applicable) and terms and conditions of the agreement the same for the entity as they are for the recipient that received the federal funds? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>a. Is the entity carrying out completion of the goal of the grant (or part, if applicable) as stated in the federal award? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p style="text-align: center;"><b>OR</b></p> <p><b>200.330 b.5</b> Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.</p> <p>b. Does the recipient develop the scope of work and terms and conditions of the agreement to meet the recipient's needs? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If you selected "yes" to <b>EITHER</b> item <b>a</b>, this is an indicator of a subrecipient relationship. If you selected "yes" to item <b>b</b>, this is an indicator of a contractor relationship.</p>	<p>If the entity is providing a service for the recipient to meet the goal of the grant, it is a contractor; if the entity is providing a service that carries out a goal within the scope of the grant, it is a subrecipient. When a grant program contains multiple goals, it is possible for the recipient to complete part of the goals and for the entity to perform another part.</p> <p>If the scope of the agreement is per the federal program terms/guidance, the entity is a subrecipient. A subrecipient may also provide programmatic or progress reports to ensure compliance with federal program requirements.</p> <p>Conversely, if the scope of the agreement is per the recipient's terms and not federal program guidance, and if the recipient's oversight is governed only by the contract terms and conditions, it is a contractor.</p> <table border="1" style="width: 100%; text-align: center;"> <tr> <td style="background-color: #1a3d4d; color: white;">Subrecipient</td> <td style="background-color: #1a3d4d; color: white;">Contractor</td> </tr> <tr> <td style="background-color: #d9d9d9;"><input type="checkbox"/></td> <td style="background-color: #d9d9d9;"><input type="checkbox"/></td> </tr> </table>	Subrecipient	Contractor	<input type="checkbox"/>	<input type="checkbox"/>
Subrecipient	Contractor				
<input type="checkbox"/>	<input type="checkbox"/>				
	<p>2</p> <p><a href="http://www.agacgfm.org">www.agacgfm.org</a></p>				



## Appendix V: Subrecipient Risk Assessment

### SUBRECIPIENT RISK ASSESSMENT QUESTIONNAIRE

Subrecipient Information	
Subrecipient Name:	
Subrecipient DUNS:	
Prime Agency:	
Project Title:	
Threshold Questions (not scored)	
<b>SAM questions (If yes to 1, 2, or 3, consider alternative to initiating agreement)</b>	
1	Is the Subrecipient Institution presently debarred or suspended?
2	Is the Subrecipient Institution's PI/Program Director presently debarred or suspended?
3	Does the Subrecipient indicate or show in SAM with the federal debt flag?
<b>(If no to 4, 5, 6 or 7, consider alternative to initiating agreement)</b>	
4	If the sponsor requires a conflict of interest policy, does the Subrecipient have a compliant policy in place?
5	Does the Subrecipient have an established accounting system?
6	Does the Subrecipient have an acceptable procurement system?
7	If required, has the Subrecipient completed a Single Audit for the most recent fiscal year?
Other Considerations	
8	Has there been a Pass-Through-Entity-issued management decision on audit findings that may affect this award?
9	Does the Subrecipient have a negotiated indirect cost rate or experience setting up a rate?
10	Is there a potential or identified conflict of interest?
11	Is cost-share required or included?
12	Is participant support included in the Subrecipient's budget?
13	Does the Subrecipient have adequate experience receiving federal funds?
14	Have other risks been identified?
Institutional Questions	
15	Is the Subrecipient institution foreign or domestic? a. Subrecipient is a U.S. based institution <input type="checkbox"/> b. Subrecipient is a foreign location with stable government and financial systems <input type="checkbox"/> c. Subrecipient is a foreign location with unstable government or financial systems <input type="checkbox"/> d. Subrecipient is in a restricted foreign location <input type="checkbox"/> SCORE <input type="text"/>
16	What is the Subrecipient Organization type? a. University <input type="checkbox"/> b. Other nonprofit <input type="checkbox"/> c. Industry <input type="checkbox"/> SCORE <input type="text"/>
17	Does the Subrecipient have a Negotiated Indirect Cost Rate Agreement? a. N/A (No requested IDC) <input type="checkbox"/> b. Yes <input type="checkbox"/> c. No <input type="checkbox"/> SCORE <input type="text"/>
18	Were the results of the most recent audit under UG (or similar) satisfactory? a. Yes, audit is clean <input type="checkbox"/> b. Yes, but audit has findings (note, if finding is relevant to project, see Audit Review) <input type="checkbox"/> c. No UG audit, but completed mini-audit (or similar audit) with no problem(s) <input type="checkbox"/> d. No UG audit, but has alternative recurring annual audit with no findings <input type="checkbox"/> e. No UG audit, and mini-audit (or similar audit) identified problem(s) (see Audit Review) <input type="checkbox"/> f. No audit <input type="checkbox"/> SCORE <input type="text"/>
19	Is the Subrecipient institution mature? a. Subrecipient experience 10+ years <input type="checkbox"/> b. Subrecipient experience 5-9 years <input type="checkbox"/> c. Subrecipient experience 1-4 years <input type="checkbox"/> d. Subrecipient is start-up (less than 1 year) <input type="checkbox"/> SCORE <input type="text"/>

20	Does the Subrecipient Institution have experience with determining conflicts of interest (evidence of an acceptable Conflict of Interest Policy)?	
	a. Yes	<input type="checkbox"/>
	b. No	<input type="checkbox"/>
<b>SCORE</b> <input type="text"/>		
<b>Project Specific Questions</b>		
21	What is the Prime Sponsor type?	
	a. Foundation or Routine Granting Agency	<input type="checkbox"/>
	b. State, Corporate, or more stringent Federal Sponsor	<input type="checkbox"/>
	c. Federal Contracting Agency	<input type="checkbox"/>
	d. Corporate Sponsor flowing down Federal Prime	<input type="checkbox"/>
	e. Government Owned/Contractor Operated	<input type="checkbox"/>
	f. Foreign sponsor or other very stringent sponsor (from any funding source)	<input type="checkbox"/>
<b>SCORE</b> <input type="text"/>		
22	What is the Prime Award type?	
	a. Grant	<input type="checkbox"/>
	b. Grant with conditions	<input type="checkbox"/>
	c. Contract or Subcontract	<input type="checkbox"/>
<b>SCORE</b> <input type="text"/>		
23	Amount of Outgoing Funds?	
	a. Outgoing Funds \$1 - \$24,999	<input type="checkbox"/>
	b. Outgoing Funds \$25,000 - \$149,999	<input type="checkbox"/>
	c. Outgoing Funds \$150,000 – \$649,999	<input type="checkbox"/>
	d. Outgoing Funds > \$650,000	<input type="checkbox"/>
<b>SCORE</b> <input type="text"/>		
24	What is the percentage of the Prime Award is being subcontracted (specific to this Subrecipient)?	
	a. 0-24%	<input type="checkbox"/>
	b. 25-49%	<input type="checkbox"/>
	c. 50% +	<input type="checkbox"/>
<b>SCORE</b> <input type="text"/>		
25	Does the work include Human Subjects, Animal Subjects or Embryonic stem cells? (MAY DELETE IF NOT APPLICABLE)	
	a. No	<input type="checkbox"/>
	b. Human or Animal Subjects approved by Subrecipient IRB or IACUC	<input type="checkbox"/>
	c. Embryonic stem cells	<input type="checkbox"/>
	d. Sponsor must approve	<input type="checkbox"/>
	e. Subrecipient using Prime Recipient's IRB or IACUC	<input type="checkbox"/>
<b>SCORE</b> <input type="text"/>		
26	Scope of Work/Deliverables	
	a. Subrecipient will only submit progress reports	<input type="checkbox"/>
	b. Subrecipient is responsible for tangible products	<input type="checkbox"/>
	c. PTE's PI/Program Manager's work is dependent upon Subrecipient's work	<input type="checkbox"/>
	d. PTE's work is dependent upon Sub's work and continuation funding is tied to performance	<input type="checkbox"/>
<b>SCORE</b> <input type="text"/>		
27	Where is the Place of Performance?	
	a. All work will be performed at the Subrecipient's Institution	<input type="checkbox"/>
	b. Some work will be performed at the PTE's Institution	<input type="checkbox"/>
	c. All work will be performed at the PTE's Institution	<input type="checkbox"/>
<b>SCORE</b> <input type="text"/>		
<b>OVERALL SCORE</b>		

Low Risk 0 - 12      Medium Risk 12 - 30      High Risk 31 - 83

<b>Management Decision Summary</b>	
Action	Comment
<input type="checkbox"/> Require payments as reimbursements rather than advance payments	
<input type="checkbox"/> Withhold authority to proceed until receipt of evidence of acceptable performance within a given period of performance	

<ul style="list-style-type: none"><li><input type="checkbox"/> Require additional, more detailed financial reports</li><li><input type="checkbox"/> Require additional project monitoring</li><li><input type="checkbox"/> Require subrecipient to obtain technical or management assistance</li><li><input type="checkbox"/> Establish additional prior approvals</li><li><input type="checkbox"/> Other (describe in comments)</li> <li><input type="checkbox"/> NO ACTION NECESSRY</li></ul>	
---	--

Reviewed by:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

If applicable, notice of decision to Subrecipient (sent within 6 months) by:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## Appendix VI: Subrecipient Monitoring Form

SUBRECIPIENT MONITORING FORM - AUDIT			
Subrecipient Legal Name:			
Subaward ID:			
Prime Agency:			
Prime Award ID:			
CFDA:			
CFDA listed in SEFA?:	Yes No Explain:		
Subaward Project Period:			
Subaward Amount/Spent:			
Subject to Single Audit?	Yes No Fiscal Year?:		
Material weaknesses in internal controls over major programs?			Yes No
Reportable conditions identified that are not considered to be material weaknesses?			Yes No
Type of report issued on compliance for major programs?			
Subrecipient qualifies as a "low-risk" auditee?			Yes No
Single Audit contains findings?			Yes No
Finding directly related to subaward from the Entity?			Yes No
Finding #	CFDA	Summary	Management Decision
			1. Audit findings sustained? Yes No 2. Expected action of Subrecipient: Repay disallowed costs Make financial adjustments Other 3. Additional monitoring? Yes No If yes, describe management plan below.
Finding #	CFDA	Summary	Management Decision
			1. Audit findings sustained? Yes No 2. Expected action of Subrecipient: Repay disallowed costs Make financial adjustments Other 3. Additional monitoring? Yes No If yes, describe management plan below.
Finding #	CFDA	Summary	Management Decision
			1. Audit findings sustained? Yes No 2. Expected action of Subrecipient: Repay disallowed costs Make financial adjustments Other 3. Additional monitoring? Yes No If yes, describe management plan below.
Prior Audit Year Findings and Review			
Finding #	CFDA	Summary and Action	
Action		Comment	
<input type="checkbox"/> Require payments as reimbursements rather than advance payments <input type="checkbox"/> Withhold authority to proceed until receipt of evidence of acceptable performance within a given period of performance <input type="checkbox"/> Require additional, more detailed financial reports Require additional project monitoring <input type="checkbox"/> Require subrecipient to obtain technical or management assistance <input type="checkbox"/> Establish additional prior approvals Other (describe) <input type="checkbox"/> NO ACTION NECESSARY			
Notes:			
Reviewed by:			
Signature		Date	
If applicable, notice of decision to Subrecipient (sent within 6 months) by:			
Signature		Date	

## Appendix VII: Closeout Checklist

### Grant Closeout Checklist

The Grants Manager will work with all departments involved to complete this form.

#### Program Manager/Principal Investigator and Project Information

<b>Name</b>	<b>Funding Agency</b>	<b>Award End Date</b>
<b>Award Number</b>	<b>Financial Software Account Number</b>	
<b>Project Title</b>		

#### Closeout Checklist

Schedule meeting with PI 90 days prior to completion of award: \_\_\_\_\_

##### Expenses

Review expenditures for allowability.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Confirm all effort is appropriate and certified.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Identify all outstanding invoices.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Confirm all expenses have posted.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Verify that all encumbrances have cleared.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Ensure all journal entries have been completed and processed.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Sub-recipients' final invoices have been paid.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

##### Record Changes

Close or change Purchase Orders.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Inform HR of account termination, change PAF.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Update budget status to "closed."	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Remove budget from Pcard accounting code options.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Log file as closed in Record Retention File.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Update Active Grants file to closed status.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

##### Reporting

All Technical Reporting Requirements have been met (PM/PI).	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
All Financial Reporting Requirements have been met (Fin).	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Ensure Cost-sharing commitments are met.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

Closeout prepared by: \_\_\_\_\_

Date: \_\_\_\_\_