

Marywood University

Policies and Procedures

Award Management and Financial Administration for Federally Funded Sponsored Projects Policy

I. Policy Statement:

This policy sets out requirements related to the award management of federally funded sponsored projects. Award management includes responsibility for financial management and oversight of grants and contracts. This policy addresses allowable/unallowable costs, the significant absence of a Principal Investigator, progress reporting to external sponsors, program income, and record-keeping related to a federally funded sponsored project.

This policy applies to all faculty members and staff engaged in sponsored project activities.

II. Policy Definitions:

A. Allocable

“Allocable,” in this policy, means a cost incurred that advances the work of a sponsored project and is chargeable to a particular cost objective.

B. Allowable

“Allowable,” in this policy, means a cost incurred that is reasonable, allocable, consistent, and conforms to any limitations or exclusions of the sponsor.

C. Award

“Award,” in this policy, means a grant, contract, subcontract, subgrant, or cooperative agreement that provides funding from an external sponsor of a sponsored project and is entered into between the sponsor and Marywood.

D. Cost Sharing

“Cost Sharing,” in this policy, means the portion of a sponsored project cost that is not borne by the sponsor but is allocated to Marywood or a third party. Cost sharing may involve cash and/or in-kind contributions, and may consist of institutional funds or funds from outside sources.

E. Cost Transfer

“Cost transfer,” in this policy, means moving expenditures from one account to another

F. Direct Costs

“Direct Cost,” in this policy, means costs that can be identified specifically with a particular final cost objective for a sponsored project, such as a federal award, or other internally or externally funded activity, or that can be directly assigned to such an activity for a particular sponsored project with a high degree of accuracy.

G. Effort Reporting

“Effort reporting,” in this policy, means an after-the-fact certification of the percentage of effort directly devoted to sponsored projects, including contributed effort; i.e. cost sharing. The certification also includes a verification that PI/Co-PI’s and other sponsored project employees are not charging more than 100% of their time to sponsored projects.

H. Indirect Costs or Facilities and Administration Costs (F&A costs)

“Indirect Costs,” “Facilities and Administration Costs,” and “F&A Costs,” in this policy, mean costs that are incurred for common or joint objectives and, therefore, cannot be identified readily and specifically with a particular sponsored project.

I. Instruction Project

“Instruction Project,” in this policy, means any project involving teaching or training activities funded by an externally sponsored grant or contract, excluding research training activities, which are considered research projects.

J. OMB Circular A-21

“OMB Circular A-21,” in this policy, means United States Management and Budget (OMB) Circular A-21, “Cost Principles for Educational Institutions,” relocated to 2CFR, Part 220, as revised or superseded.

K. Principal Investigator (PI)

“Principal Investigator” and “PI,” in this policy, mean a single

individual who, in the event of an award from an external funding agency, shall have the full and final responsibility for the conduct of the sponsored project as proposed and as outlined in the award.

L. Program Income

“Program income,” in this policy, as defined by 2 CFR 200.80, means gross income earned by the non-federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the performance period. Program income includes but is not limited to income from fees for services performed, the use or rental of real or personal property acquired under federal awards, the sale of commodities or items fabricated under a Federal award, license fees, and royalties on patents and copyrights, and principal and interest on loans made with federal award funds.

M. Progress Reporting

“Progress Reporting,” in this policy, means the technical report submitted by the PI to the sponsor as required by the sponsor guidelines.

N. Public Service Project

“Public Service Project,” in this policy, means any project involving activities other than instruction or research such as public health and community service projects.

O. Research Project

“Research Project,” in this policy, means a systematic study directed toward fuller scientific knowledge or understanding of the subject studied. It also involves the training of individuals in research techniques where such activities utilize the same facilities as other research activities.

P. Sponsored Project

“Sponsored Project,” in this policy, means a project funded by an external sponsor through a grant or contract with Marywood where one or more of the following obligations apply (examples of

sponsored projects include but are not limited to instruction projects, public service projects, or research projects).

1. Financial Obligation

Marywood is required to comply with conditions imposed when a sponsor awards funding for the performance of services or delivery of products described in a statement of work.

2. Regulatory Obligation

Marywood is required to comply with sponsor regulations, which may include federal or state regulations.

3. Reporting Obligation

Marywood is required to provide to the sponsor technical performance reports, regulatory, or administrative reports.

4. Performance Obligation

Marywood is required to perform within a certain period (referred to as the Period of Performance) and may be required to meet other specified requirements related to performance.

5. Accounting Obligation

Marywood is required to establish a separate accounting record of project expenditures to demonstrate allowance of costs, to maintain financial accountability, to provide financial reports to the sponsor, and to preserve appropriate records for audit purposes.

Q. Uniform Guidance

“Uniform Guidance,” in this policy, means OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR Part 200, et al. The Office of Management and Budget (OMB) issued Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in the Federal Register.

The Uniform Guidance replaces the administrative, accounting and audit rules and principles promulgated in the OMB Circulars including A-21, A-110, and A-133.

Procedures:

I. Policy Responsibilities

A. Oversight Responsibility

The Assistant Vice President (AVP) for Research and Sponsored Programs and the Grant Accountant are responsible for overseeing award management and financial administration efforts of the Principal Investigator, department, and college; and address issues as necessary to ensure compliance with the prime award, federal and state laws, and regulations, and institutional policies.

B. Cost Principles for Sponsored Projects

1. For any costs to be charged directly to an award, the expense must be allowable, allocable, reasonable, necessary, and consistently charged. The Principal Investigator, the AVP for Research and Sponsored Programs, and the Grant Accountant will coordinate to exercise financial management and oversight of sponsored project grants and contracts to ensure that all charges comply with these cost principles.
2. Charges must be charged consistently and categorized as either a direct cost or an indirect cost. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct expenses or indirect costs.
3. All federal awards issued after December 26, 2014, must comply with the Uniform Guidance award management and financial administration requirements.
4. In addition to the Uniform Guidance, Marywood must comply with the Cost Accounting Standards (CAS) located in 48 CFR §9905.501, §9905.502, §9905.505, and §9905.506. The purpose of the CAS is to ensure consistency in:
 - a. Estimating, accumulating, and reporting costs (CAS 501)
 - b. Allocating costs incurred for the same purpose in like

circumstances (CAS 502)

c. Accounting for unallowable costs (CAS 505)

d. Cost accounting periods (CAS 506)

C. Monitoring Financial Activity

The Principal Investigator is responsible for monitoring financial activity related to a sponsored project on a regular basis (at least monthly). All expenditures must comply with Marywood Policy "Federal Funds Procurement Policy." The Principal Investigator must address any discrepancies with the AVP for Research and Sponsored Programs.

D. Financial Responsibility of Grants and Contracts Administration

In the award management and financial administration of sponsored projects, the Grant Accountant is responsible for:

- i. Preparing all billings and financial reports on sponsored projects.
- ii. Monitoring and administering account receivables for all sponsored projects.
- iii. Receiving and depositing all payments made on sponsored project accounts.

E. Federal Drawdown Procedures

The Grant Accountant draws down federal funds approximately once a month unless the federal granting agency requires another way of accessing their funds. Federal funds are drawn down on a cost-reimbursement basis. The Grant Accountant maintains a cash request spreadsheet. The negative cash balance of each grant is added to the cash request spreadsheet which is organized by individual grant index, granting agency, and the total of all federal grant funds to be drawn down. The Grant Accountant will access the appropriate federal website to request the drawdown amount. After the drawdown requests have occurred, the Grant Accountant completes the cash request spreadsheet and sends it to the Controller. The completed worksheet is used to allocate the funds when the university receives them from the bank. Federal grant funds are received from each

granting agency via wire or ACH transfer. The Grant Accountant creates a journal voucher to record the funds received to the appropriate grant index(es). The journal voucher is electronically approved by the Controller.

F. Administrative and Clerical Salaries (2 CFR §200.413(c))

1. Principal Investigators are only allowed to charge administrative or clerical salaries to a sponsored project as set forth in this policy. Administrative and clerical personnel provide non-technical support services that benefit departmental, institute, center, or college activities. The services of these individuals could include: clerical support, financial management, procurement of materials and services, budget and planning, and personnel management.

2. The salaries of administrative and clerical personnel are normally required to be treated as an indirect cost unless they meet certain Uniform Guidance criteria. As stipulated in the Uniform Guidance, direct charging of administrative salaries is allowable when all of the following conditions are met:

- a. Administrative or clerical services are integral to a project or activity;
- b. Individuals involved can be specifically identified with the project or activity;
- c. Such expenses are explicitly included in the budget or have the prior written approval of the federal awarding agency; and
- d. The costs are not also recovered as indirect costs.

3. Administrative and clerical salaries charged improperly to federal awards result in unallowable costs, requiring reimbursement to the government and, depending on severity, additional penalties for Marywood.

G. Travel and Related Expenses (2 CFR §200.474)

1. Travel-related expenses are allowable as direct expenses when they provide a direct benefit to the sponsored award and meet

certain requirements. Domestic and foreign travel charged to a sponsored project must comply with this policy as well as with other Marywood travel guidelines and sponsor requirements, whichever imposes the greater restrictions.

2. In order to charge a business meal on a federal award, an itemized receipt should be presented, regardless of cost.
3. Federal regulations require travelers to incur the lowest possible expense to the federal award; in most circumstances, this is a non-refundable (restricted) economy class airfare.
4. Federal regulations require that airfare costs in excess of the lowest economy fare class are unallowable except when such accommodations would:
 - a. require circuitous routing,
 - b. require travel during unreasonable hours,
 - c. excessively prolong travel,
 - d. result in additional costs that would offset the transportation savings, or
 - e. offer accommodations not reasonably adequate for the traveler's medical needs.
5. Once these criteria are met, the traveler must justify and document the exception for the use of business-class or upgraded economy airfare to be allowable on a federal award. Complementary (no-cost) upgrades are allowed.
6. There may be circumstances where there is a high likelihood that the itinerary may change; in these situations, it is appropriate to purchase a refundable (unrestricted) ticket. When requesting a reimbursement, the reason for purchasing a refundable ticket must be explained.
7. All air travel on federal awards must comply with the Fly America Act and use US Flag Carriers, even when a less costly foreign flag carrier is available, unless the flight meets the circumstances and exceptions. To determine if an authorized exception applies, the

Principal Investigator must check with the Grants and Contract Administration or their College Research Officer. The Principal Investigator must retain documentation of the Fly America exceptions.

8. The Open Skies Agreement is an exception to the Fly America Act requirement and it allows travelers to fly on airlines from the European Union, Australia, Switzerland, and Japan under certain circumstances. To determine if a flight meets the Open Skies Agreement criteria, the Principal Investigator must check with the Grants and Contract Administration or their College Research Officer.

H. Prior Written Approval of Certain Costs in order to be Charged to Federal Grants

1. For Items requiring prior approval, the Principal Investigator must request specifically and obtain approval for an item in the proposal budget or must request approval by the sponsor, in writing, before the expense is charged to the award. In most cases, written approval from the program officer is not sufficient; instead, the Principal Investigator must refer to the terms and conditions of the award for information regarding who can authorize changes to the award budget.
2. Only those costs that meet the criteria for direct expenses on a federal award, can be directly charged to an award under any circumstances.
3. Per the Uniform Guidance, prior written approval from the sponsor is explicitly required for:
 - a) Change of key personnel (200.308 (c)(2))
 - b) Change of scope (200.308 (c)(1))
 - c) Cost sharing or matching (200.308 (c)(7))
 - d) Effort reduction of key personnel greater than 25% or PI disengagement from project of greater than 3 months (200.308 (c)(3))
 - e) Fixed amount sub-awards (200.332)

- f) Participant support costs, any transfer of budget (200.308 (c)(5)) and (200.456)
 - g) Rearrangement and reconversion expenses (Renovations) (200.462)
 - h) Use of program income (200.307)
 - i) Entertainment costs (200.438)
 - j) Sub-awards, any changes or transfers (200.308 (c)(6))
4. The following also may require prior approval depending on the award:
- a. Carry forward (200.308 (d)(3))
 - b. No cost extension (200.308 (d)(2))
 - c. Pre-award Expenses (200.458)
5. The Grant Accountant is responsible for requesting approval of an expense from the sponsor if required.

I. Notification Requirements

1. The Principal Investigators are responsible for notifying the AVP for Research and Sponsored Programs when anticipating an absence from Marywood that may negatively impact a sponsored project and/or would require relinquishing the direction of the sponsored project. Notification is also required in the event of a significant change in effort (increase or decrease greater than 25 percent of effort committed at the time of the award) or plans to transfer to another institution.
2. The AVP for Research and Sponsored Programs is responsible for notifying the sponsor of any significant absence of a Principal Investigator and negotiating a replacement Principal Investigator for the applicable sponsored project award. The replacement Principal Investigator must be acceptable to the sponsor, the AVP for Research and Sponsored Programs, the Department Unit Administrator, the appropriate Dean, and the Chief Academic Officer.

J. Record Keeping

The Principal Investigator shall maintain and monitor accounting records of purchases and encumbrances to stay within the approved sponsored project budget. All expenditures on sponsored project accounts must be submitted to Grant Accountant for approval in accordance with Marywood's *Federal Funds Procurement Policy*.

K. Cost Allocation Methodologies to be used for Federally Funded Sponsored Projects

1. Whenever possible, Principal Investigators must charge specific expenses to a specific sponsored award. When it is not possible or efficient to determine how much of the cost is used for each award, allocation of the expenses is allowable. Allocation assigns a cost to one or more awards in reasonable and realistic proportion to the benefit provided to the sponsored projects.
2. At Marywood, allocation methodologies must meet the following criteria:
 - a) The allocation must provide a reasonable linkage between the cost incurred and the benefit to individual sponsored projects,
 - b) The allocation methodology must be identified for the allocation of expenses and documented in a way that a person unfamiliar with grants management would understand,
 - c) Each methodology should be applied consistently for similar costs that meet the criteria of the allocation methodology, and
 - d) Allocation methodology must be reviewed and approved by the AVP for Research and Sponsored Programs and the Grant Accountant.

Policy History:

12/16/2024: The President of the University approved the establishment of the policy as recommended by the Policy Committee at their December 13, 2024 meeting.

RELATED POLICIES:

Federal Funds Procurement Policy

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**Mary Theresa Gardier Paterson, Esquire
Secretary of the University and General Counsel**