

Grant Management Post-Award Policy

General

Berry College actively encourages members of the Faculty to pursue grants and contracts related to their teaching and research interests. The College reserves the right, however, to review all proposals of grants and contracts to ensure that the institutional purposes and goals of the College are not compromised.

The acceptance of an award from a sponsored source, including the federal government is a legal duty on the part of the awardee organization to use funds or property made available in accordance with the conditions of the award. **The Office of Management and Budget (OMB) has developed grant accounting policies, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Rule, 2 CFR 200, December 26, 2014 (“Uniform Guidance”), which are often followed by other funding sources. In addition, grant awards may be subject to special terms and conditions and/or agency-specific requirements. Failure to comply with these standards could have a significant negative impact on Berry.**

Although, in most grants and contracts, the College is legally responsible to the sponsor as the recipient of a grant or contract, the Project Director (PD) / Principal Investigator (PI) is accountable for the proper fiscal management and conduct of the project. This includes managing the project within funding limitations and all of the terms of the award, assuring that the sponsor is notified when significant conditions related to project status change, and ensuring that all programmatic reporting requirements are met in a timely fashion. While responsibility for the day-to-day management of project finances may be delegated to administrative or other staff, accountability for compliance with federal requirements, College policies, and sponsor requirements ultimately rests with the PD/PI. Similarly, PD/Pis have primary responsibility for planning and carrying out the preparation and submission of proposals for external support. Although PD/Pis may work with others in the proposal development process, they are ultimately responsible for the quality and academic integrity of the proposal, and for understanding and complying with all Berry College academic and fiscal management policies for managing external support.

Standards for Financial and Program Management

- Changes in Budget, Program Plans, and Key Personnel

Notification or prior approval for changes in scope or objective of the project as stated in the approved application/proposal may be required by the awarding sponsor. Examples include budget revisions, key personnel, staffing mix, and level of involvement. Approvals must be documented and maintained in the grant file.

- Equipment and Other Capital Expenditures

In accordance with 2 CFR §200.313, equipment may only be purchased by a grant with the approval of the Federal awarding agency or pass-through entity. Accordingly, before purchasing equipment, the PD/PI shall ensure that the proper authorization has been granted under the terms of the grant. Such equipment shall be acquired and used in accordance with the *Research Terms & Conditions*.

Records on equipment purchased using funds from federal awards shall be maintained that include the following information.

- A description of the equipment.
- Source of the equipment, including the College's internal account number and the federal award number.
- Acquisition date and cost.
- Vendor name.
- Location of the equipment.

A physical inventory of equipment shall be taken and the results reconciled with the equipment records at least once every two years. Any differences between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the causes of the difference.

When the equipment is not in use, the room that it is located in shall remain locked. Equipment shall be stored in locations with appropriate climate control. The equipment should be inspected at least annually.

- Procurement Standards

The PD/PI is responsible for the purchase of all goods and services for the project and for ensuring that such purchases comply with procedures applicable to the grant. This includes making certain that competitive purchasing procedures are followed. In all cases, purchases should be at reasonable prices and for bona fide purposes consistent with the needs of the project. Moreover, the PD/PI shall ensure that all purchases are within the budget established for the project.

- Indirect Costs

Indirect cost charges are intended to reimburse the College's for the Project's use of College facilities and equipment used in research activities in addition to covering a share of the College's general and administrative costs or overhead. Please consult with the Office of Research and Sponsored Programs.

- Cost Sharing/Matching Requirement

Certain federal agencies encourage or require cost sharing by the College. Cost sharing may be in the form of past or current support of related work by non-federal

sources. This includes direct contributions or in-kind goods and services from the College, private foundations, or industry.

Many funded projects require matching resources that are contributed to a sponsored project over and above the support provided by the external sponsor of that project. Such resources are required of the Foundation by the sponsor as a condition of the award, to "match" the sponsor's support. Funds required might be an arbitrary portion, a fixed amount, or resources from non-College sources pledged in partial support of a project in the form of a Cash Match or In-Kind Match.

Mandatory Cost Share/Match should be written into the proposal budget. PD/PIs are responsible for securing all Cost Share/Match requirements and for following appropriate guidelines.

Cost Principles

Uniform Guidance sets forth standards for obtaining consistency and uniformity in organizations expending Federal awards. All expenditures incurred under sponsored grants should be allowable, reasonable, allocable, and necessary as defined by 2 CFR 200, Subpart E – Cost Principles

- Allowable and Unallowable Costs

Examples of allowable costs include direct costs related to the specific scope and objective of the project, (i.e., personnel, communication costs, operating supplies and materials, travel, equipment and other project related costs). Examples of Unallowable costs include alcoholic beverages, bad debts, alumni activities, commencement and convocation costs, donations and contributions, entertainment costs, and lobbying costs.

- Reasonable Cost

A cost may be considered reasonable if the nature of the goods or services acquired or applied, and the amount involved, reflect the actions a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made.

- Allocable cost

A cost is "allocable" to a particular cost objective (i.e., a specific function, project, and sponsored agreement) if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received or other equitable relationships.

- Compensation

Charges for work performed on Federal awards by faculty members during the academic year are allowable at the Institutional Base Salary (IBS) rate. Unless there

is prior approval by the awarding agency and except as noted in paragraph (h)(1)(ii) of 2 CFR §200.430, in no event will charges to Federal awards, irrespective of the basis of computation, exceed the proportionate share of the IBS for that period per 2 CFR §200.430(h)(2).

- Documentation of Personnel Expenses

The Federal government requires an effort report when an individual is compensated by, or has agreed to contribute time to, a federally-sponsored project. All faculty who serve as investigators on sponsored projects are personally responsible to certify the amount of effort that they and their employees spend on sponsored activities.

In accordance with 2 CFR §200.430(i), Berry College requires effort reports for all faculty, staff, students and sub-recipients who work on and are compensated for sponsored projects, whether federal or non-federal in source, regardless of whether the effort is paid or unpaid. Berry uses after-the-fact certification. Faculty and staff submit time and effort reports annually in October to the Department of Research & Sponsored Programs. Non-exempt employees who complete auditable timecards are not subject to effort reporting procedures. Effort reports must comply with Uniform Guidance Standards for Documentation of Personnel Expenses as follows:

1. Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:
 - Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated.
 - Be incorporated into the official records of the non-Federal entity.
 - Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity
 - Comply with the established accounting policies and practices of the non-Federal entity.
 - Support the distribution of the employee's salary or wages among specific activities or cost objectives.

Note: budget estimates alone do not qualify as support for charges to Federal awards.

2. Because practices vary as to the activity constituting a full workload, records may reflect categories of activities expressed as a percentage distribution of total activities.
3. Salaries and wages of employees used in meeting cost sharing or matching requirements on Federal awards must be supported in the same manner as salaries and wages claimed for reimbursement from Federal awards.
4. It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to Federal awards, a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected.

- Travel Costs

The PD/PI or his/her designee is responsible for arranging transportation, lodging, or other accommodations as required. The PD/PI is responsible for ensuring that travel arrangements are consistent with any restrictions of the grant as applicable. State and federal grants generally contain specific provisions regarding travel including, for instance, restrictions on air travel (see 2 CFR §200.444).

Upon completion of appropriate forms, the College will reimburse travelers for all reasonable expenses. In no case will reimbursement be for amounts in excess of actual expenditures. All travelers are expected to be reasonable and prudent in the selection of accommodations, meals, and method of travel. The following guidelines will generally apply.

Air coach or other intermediate class should be used in the interest of economy whenever available. Special restrictions apply to international air travel using non-US carriers. Please consult with the Office of Research and Sponsored Programs.

Use of a personal vehicle will be reimbursed at the current rate in effect for the College, should a College vehicle be unavailable for use. When necessary, use of a rental vehicle and/or taxi service, including reasonable tip, are allowable.

Meals and tips will be reimbursed at actual cost. Hotel expenses will be reimbursed at actual cost provided it is reasonable for the given area. Other necessary expenses shall be reimbursed provided they are properly explained (includes registration fees, parking fees etc.).

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CFR 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award" <https://www.law.cornell.edu/cfr/text/2/part-2002>