

VASSAR COLLEGE

Post-Award Grants Administration Manual

Introduction

The effective management of grants, particularly federally funded research awards, requires that Principal Investigators (PIs) understand and adhere to associated regulations and compliance considerations. This manual describes Vassar College's grants-related policies, processes, and practices to support PIs and administrative staff as they manage their respective awards.

PIs who are managing grant awards are responsible for overseeing two related areas: 1) the research or program activities; and 2) the budgetary or financial components. Ensuring that a project's goals and objectives are met on time; that research and/or program staff are hired, trained, and effectively managed; and that the outcomes are evaluated and disseminated, all as proposed, are all vitally important. It is equally important to accomplish these tasks within the approved budget and in strict adherence to all relevant terms and conditions.

Principal Investigators must have a formal relationship with Vassar College, as delineated by Dean of Faculty appointment as a full-time faculty member or visiting scholar/researcher or similar and/or employee status, as determined by the Grants Office, in order to submit proposals and/or direct projects funded by an external sponsor. Continuing eligibility is contingent upon continuing appointment or employment at the College, as well as ongoing compliance with all other applicable policies of the College and respective funding agency.

Workday is Vassar College's system of record for financial management and human resources. It is used to track all grant expenditures and associated activity. The Director of Sponsored Research Administration and the Senior Accountant for Grants & Restricted Funds assist PIs and their designees with post-award activities, including reviewing and approving grants-related transactions in Workday. The information below provides a framework within which PIs can consider their post-award responsibilities and funding agency requirements.

PIs can access grant budget information and detailed expenditures in Workday, and the Director of Sponsored Research Administration and the Senior Accountant for Grants & Restricted Funds can provide information to supplement or clarify WD reports, whenever needed. Regular PI meetings with the Grants Office support post-award functions, including providing assistance with or clarifying questions about Workday transactions or reports.

Receiving a Grant Award

Budget Negotiations & Requests for "Just-in-time" Information: On occasion, the first indication that a proposal may be funded is a phone call or email from the sponsoring agency requesting additional "just-in-time" information or indicating that a budget revision might be needed.

PIs who receive calls or emails from funding agencies should immediately notify the Grants Office. The Office can assist with preparing and submitting forms that might be required, such as

updated current and pending support documents. Funding agencies typically have specific guidelines relating to [other support \(NIH\)](#) or the [disclosure of current and pending support](#) that must be adhered to. The Grants Office can also provide guidance in terms of addressing any significant budgetary or programmatic revisions that are requested.

Grants Office Personnel Authorized to Approve Proposals and Accept Awards and Subsequent Amendments

A “Delegation of Authority Memorandum,” initiated by the Grants Office annually, authorizes the 1) Assistant Dean for Grants Administration and 2) Director of Sponsored Research Administration of Grants Development and Associate Vice President of Foundation & Government Relations to review and execute grant applications for faculty sponsored research and institutional funding as well as related certifications, assurances and agreements, no-cost extension requests, and other related amendments, requests and notifications, provided the Dean of Faculty has approved prior to the submission of proposals.

This Memorandum is reviewed and signed annually by the Vice President for Finance and Administration, who, by resolution of Vassar’s Board of Trustees, is authorized to execute grant documents on behalf of the board.

OMB Uniform Guidance Regulations and Cost Principles Compliance

The Grants Office facilitates, as needed, PIs' consultation with the Dean of Faculty or other relevant offices, including regarding cost sharing (also known as matching funds) if required. “Cost principles,” as defined by the Federal Office of Management and Budget Uniform Guidance (Uniform Guidance) or other sponsor regulations, must be adhered to at the end of the proposal stage as well as when funds are expended. The Grants Office’s input can help ensure compliance at this critical stage and throughout the project period.

Grants Office Grant Acceptance Form

Once a grant is awarded, the documentation (notice of award, fully executed grant agreement, etc.) is reviewed by the Grants Office for sponsor terms and conditions. The Grants Office works with PIs to review and complete a Grant Acceptance Form, which documents those details, as well as report deadlines and other important information.

Set-up in Workday

After the official Notice of Award (NOA) is received, as a supplement to the award number that is assigned by the sponsor, the Grants and Accounting Services Offices work collaboratively to set up the award in Workday, including creating an Award and Grant worktags (ex. AWD000123/GR000123) for internal monitoring purposes, and an itemized budget per the NOA, assigning Business Process (BP) roles, and notifying the PI of the appropriate Worktags, related processes, etc. The Award tag in Workday establishes the broad parameters, including the terms and conditions, billing schedule, award period, etc. The Grant tag(s) in Workday segregates sponsored research expenses according to the approved budget. Additional tags in Workday are used to denote other items, such as the appropriate cost center - typically the department in which the grant is located - and the function or purpose (instruction, research, etc.)

The Grants Office can assist faculty PIs with determining what roles in Workday may be needed for any support staff.

Grants Office support is also available to help PIs work with Human Resources regarding hiring needs for the project as well as with other offices such as Communications in order to publicize the receipt of grant awards.

Pre-award Spending

PIs must work with the Grants Office if they anticipate needing to charge the grant during the pre-award period. Uniform Guidance generally allows PIs to incur allowable and allocable costs that pertain to the project up to 90 days prior to the start date of the award, subject to sponsor guidelines and terms of specific award.

The Grants Office can forward documentation to the Senior Accountant for Grants & Restricted Funds, who will facilitate those charges if:

- They are included in the approved budget;
- A formal notice of award has been received from the funding agency; and
- The appropriate senior officer approves.

Compensation - Budgeting and Monitoring

Guidelines

As required under Uniform Guidance, compensation costs must be charged to sponsored programs in a consistent manner.

All faculty salaries charged to grants must *be based on the Institutional Base Salary (IBS)*, defined herein. The IBS is the baseline against which effort expended by faculty in performing work under a Federal award is calculated.

IBS is the *annual compensation* that Vassar pays a faculty member for time spent on teaching, research, service, and/or administrative duties. IBS is established by the College during an annual review process, documented in an annual appointment letter to the faculty member, and reflected in Workday such that the Director of Sponsored Research Administration and the Senior Accountant for Grants & Restricted Funds can verify.

IBS generally *changes at the beginning of the fiscal year* (July 1), but can change during the year due to various circumstances such as assuming or relinquishing specific duties or promotion in rank or position.

The IBS *excludes* compensation for irregular, short-term, and voluntary assignments (“extra service pay” as per Uniform Guidance), such as compensation for teaching outside of normal periods nor does it include one-time payments or incentive pay, such as faculty housing allowances or tuition reimbursements.

Summer Salary: Salaries for work performed by Vassar’s nine-month faculty on sponsored projects during the summer months are calculated as 1/9th of the IBS, times the number of months committed to the project.

Personnel compensation for other types of employees: For other types of employees, PIs should consult with the Grants Office, which works closely with HR, the Dean of Faculty Office, and/or Student Employment, to determine the appropriate hourly wage or annual salary, etc. for employees. For administrator positions, Vassar has salary ranges in place for groups of standard positions and relevant senior officers help “grade” positions according to a rubric. All federally-funded employees adhere to the Policy and Process for Uniform Guidance Compensation Confirmation described in detail below.

Annual increases of 3.5% for faculty positions and 3% for administrator positions are typically built into grant budgets, whenever possible, to align with college-wide increases. PIs should work closely with the Grants Office to evaluate grant-funded employee compensation increases, as allowable and warranted.

Fringe benefits for full-time employees in the amount of 38% are included in grant budgets, whenever allowed, to cover all possible contingencies such as health care coverage for family members. Actual benefits are charged by Workday, and only those actual costs are charged to and reimbursed by sponsors.

Moving expenses, depending on sponsor terms and conditions and Vassar institutional policy, may be allowable as a benefit if included in approved grant budgets.

Generally, a commitment of effort on the part of the PI during the period in which work is being performed is expected. This effort may be expended during the academic year and/or summer, and it is either directly charged to the grant or cost shared.

Budgeting Process

Because payroll is often the most expensive budget line item in a grant, the payroll budgeting process requires several steps involving collaboration and review:

- Pre-Award consultation with the Dean of the Faculty’s Office such that all proposals and budgets submitted include correct IBS.
- At the time of award/acceptance, the Grants Office reviews the budget to confirm that salaries and wages are estimated correctly and reasonable for the work that will be performed.
- As the project moves forward, the Director of Sponsored Research Administration and the Senior Accountant for Grants & Restricted Funds review payroll charges and consults, where needed, with the PI. When needed, the Director of Sponsored Research Administration and the Senior Accountant for Grants & Restricted Funds work with the PI to ensure timely reallocations of payroll or any necessary cost transfers.

Monitoring and Review Process

Ensuring the accuracy of the compensation charges involves timely review. Once final amounts are reviewed and confirmed, compensation charges become award expenditures in Workday (and are officially recorded as allowable, allocable, reasonable, benefiting the project, and consistent with institutional policy), and the amounts can be relied upon for accuracy of financial reporting to the sponsor.

- PIs should **regularly review expenditure reports** to ensure that salaries and wages charged to federal awards are accurate, allowable, and properly allocated. This regular monitoring of payroll charges throughout the budget period is central to Vassar's compliance program.
- On an annual basis, PIs on federally funded awards must confirm via review of and signature on Vassar's compensation confirmation form that the salaries and wages of individuals charged to their respective projects are **reasonable and accurate** based on the work performed.
- Salaries of employees used in meeting committed cost sharing or matching requirements on federal awards must be supported in the same manner as direct charges. The Director of Sponsored Research Administration will work with PIs to determine how to appropriately track and document these charges.
 - *Cost Sharing*: Cost sharing is the portion of a project cost that is not charged to the sponsor; Vassar does not recommend including in grant applications voluntary cost share (institutional match not required by the funder), and requires that any cost sharing be approved by a senior officer prior to commitment as well as tracked and documented, if approved. For federal grant awards, items committed as cost sharing must meet Uniform Guidance requirements:
 - Verifiable from institutional records
 - Not included as contributions for any other federal award
 - Necessary and reasonable;
 - Allowable under Subpart E – Cost Principles;
 - Included in the approved budget, when required by the Federal sponsor; and
 - Unrecovered indirect costs may be included as part of cost sharing or matching only
 - with the prior approval of the federal awarding agency.
- Any salary adjustments must be made within 90 days. Corrections in Workday to payroll allocations that were previously certified or made in error should be infrequent, performed within a reasonable time period (within 90 days of discovery), and fully justified by the PI and/or Grants Office through a description of how the error occurred and how it will be prevented in the future. Adjustments beyond the 90-day period must be documented and approved by the Director of Sponsored Research Administration, who forwards approval and documentation to the Senior Accountant for Grants & Restricted Funds for processing.

- The Director of Sponsored Research Administration and the Senior Accountant for Grants & Restricted Funds regularly review payroll reports to ensure appropriate Worktags and charges. The Director of Sponsored Research Administration also performs monthly reviews to ensure that procedures for Payroll Certification on Federally Sponsored Projects are being followed as intended. The Director of Sponsored Research Administration follows up with the PI and/or HR immediately on any irregularities or deficiencies that are identified in order to determine and address the cause.

PIs should consult with the Grants Office at the time of hire to ensure the appropriate steps are followed to support effective monitoring and reporting.

Allowable and Unallowable Direct and Indirect Costs

Acceptable Direct Costs: All direct costs must meet the OMB Uniform Guidance requirements and be "identifiable to a particular cost objective." For federal grant awards, items such as salaries of administrative and clerical staff, office supplies, postage, and membership dues are normally treated as indirect costs. However, for special purposes and circumstances, costs that are normally indirect may be directly charged if all of these conditions are met:

- Costs can be directly identified with the sponsored project and fulfillment of its objectives;
- Costs are included in the approved budget or have prior written approval;
- Costs are not recovered as indirect costs;
- Administrative effort charged directly is allocated based on the proportional benefit to the project;
- Non-personnel costs such as office supplies or laptops are essential to fulfill project objectives.

Documentation of Direct Costs

- The cost must be identified with the activity in the sponsored award to which the cost is charged.
- Documentation that links the cost incurred to the sponsored agreement activity should be attached by the PI or designee in Workday to relevant transactions.
- Only actual costs may be charged to the grant, not estimated costs.
- For grant awards, in accordance with the OMB Uniform Guidance, section 200.333 and Vassar's [Records Retention Policy](#) for grants, financial records (as well as supporting documents, statistical records, and all other records pertinent to a Federal award) must be retained past the date of approval of the last financial and technical report/close of grant + 3 years, OR the period stated in the award document, whichever is longer. Official grant records are maintained in Workday and/or electronic format (pdf files) in the Grants Office shared drive.

Unacceptable Direct Costing Practices

The following direct costing practices are unacceptable because they do not meet the OMB's Uniform Guidance's standard for a "high degree of accuracy" in the assignment of costs to sponsored projects:

- Rotation of charges among grants without establishing the relative benefit to each project;
- Assigning charges to grants in order to spend the remaining balance with no benefit to the project;
- Charging the budgeted amount (in contrast to charging an amount based on actual usage);
- Assigning charges to a sponsored agreement in advance of the time the actual cost is incurred;
- Charging expenses exclusively to a particular grant when the expense supports more than one award; and/or
- For Federal awards, assigning charges that are generally part of indirect costs (normal administrative support, etc.).

Indirect Costs or Facilities and Administrative (F&A) Costs

Indirect costs are those that are incurred for common or joint activities of the College and, therefore, cannot be identified readily and specifically with a particular grant such as charges for administrative and clerical salaries, general office supplies, postage, local telephone charges, office equipment, internet and other general costs.

Accounting for Unallowable Costs

Proper accounting for unallowable costs is required to maintain compliance with Federal regulations and the integrity of the College's Facilities and Administrative (F&A) Cost Proposal.

All costs proposed or incurred on a grant must comply with the terms and conditions of the sponsor and approved budget in determining which are allowable or unallowable. At no time should unallowable costs – direct or indirect expenses that are not reimbursable under either federal regulations or the terms and conditions of a particular sponsored award – be charged to a grant.

Activities and expenses that are unallowable for reimbursement on a federally-funded award may still be appropriate, necessary and allowable on a non-federally funded award. It is the responsibility of the PI to monitor award expenditures to ensure that unallowable costs are identified. In certain specific situations, PIs may still incur these activities/expenses, but they must be coded as unallowable so they can be charged to a non-grant account and excluded from the indirect cost calculation.

The PI is responsible for ensuring that all expenditures are allowable and in compliance with applicable funder requirements; the Director of Sponsored Research Administration supports the PI in these efforts and reviews expenditures prior to approval to identify any unallowable costs and prevent these costs from being included in any proposal, billing or claim that applies to a federally funded award.

Accounting Treatment of Unallowable Costs

The Uniform Guidance establishes principles for determining the allowable costs incurred under federal awards. An allowable cost is a cost that meets all of the following criteria:

- It serves a Vassar College business purpose, including instruction, research and public service;
- It is permissible according to Vassar's policies and federal regulations; and

- It is permissible according to the terms and conditions of the sponsored award.

The Uniform Guidance specifically delineates certain costs as being “Unallowable”, meaning that they may never be directly charged to a grant without prior written approval or included in the College’s calculation of its F&A rate. Unallowable costs include the following:

- Alumnae/i activities
- Commencement and convocation costs
- Organized fundraisers
- Lobbying (federal, state or local)
- Bad debt costs
- Selling and marketing costs
- Fines and penalties
- Entertainment/Good or Services for Personal Use
- Alcohol
- Flowers
- Gifts
- Furniture
- Construction
- Housing and personal living expenses (utilities, rent, etc.)
- First or business class travel, unless approved by the appropriate senior officer

Application of Facilities & Administrative Cost Rates (F&A)

Facilities & Administrative (F&A and/or indirect cost) Rates are applied to grants in accordance with Vassar’s [negotiated rate agreement](#) with the federal government and [policy on F&A](#).

Modified Total Direct Costs (MTDC) is the base against which F&A (indirect cost) rates are applied. Vassar’s Negotiated Rate Agreement defines this base as follows:

“Modified total direct costs, consisting of all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$25,000 of each subaward (regardless of the period of performance of the subawards under the award). Modified total direct costs shall exclude equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of \$25,000.”

Application of Off-Campus F&A Rates

Vassar negotiates the College’s F&A rate with the Department of Health and Human Services and must determine whether to apply the rate for on-campus projects or for off-campus projects.

In order to determine the correct rate to use, the Grants Office works with PIs to identify where projects will take place. Space is designated as on-campus - and the on-campus rate is applied - if the majority of sponsored activity is conducted in space owned or leased by the College or if rental and facilities costs for off-campus facilities are not charged directly to the project or calculated and included as cost share.

Space is designated as off-campus, and the off-site rate is applied, in cases where the majority of sponsored activity is conducted at a location other than the College and the cost of rent or lease

and related facility costs are directly charged to the project or donated by another entity and identified as cost share.

Documentation confirming the off-campus status of the project location and the facility costs must be included with the proposed budget and approved via the grant routing form.

Participant Support Costs

Participant support costs, according to 2 CFR 200.75, are “direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.” A participant is defined as a non-employee who is the recipient - not the provider - of a service or training associated with a workshop, conference, seminar, symposium, or other short-term instructional or information sharing activity.

Participants, who may be students, scholars, scientists or teachers, are not required to provide any deliverable, other than meeting the program requirements (e.g. attendance, testing, etc.). Typical participant support cost categories are stipends, travel, and subsistence (housing and meals), and other related costs might also be included.

Vassar segregates participant support costs in Workday by creating separate grants under the individual award. All of the following criteria are required in order for a participant support cost to be allowable:

- The costs are included in an approved budget or prior written approval is received from the federal awarding agency;
- The cost is a direct cost on the project.
- The costs are justified programmatically.

Participants cannot be employees of Vassar or anyone who has a deliverable or is primarily providing a service to the project, and participant support costs do not include the following types of expenses:

- Honoraria paid to a guest speaker or lecturer;
- Expenses for project personnel or collaborators to attend meetings, conferences, or seminars;
- Payments to participants in human subject research studies; and/or
- Conference support costs such as facility or equipment rentals.

Indirect Costs (F&A) are not allowable on participant support costs; separate grant tags in Workday ensure that F&A is not charged.

When subawards with approved participant support costs are issued, the PI is responsible for monitoring subawardee invoices to ensure that the participant support costs are being accounted for separately, and that these costs are allowable.

Rebudgeting out of the participant support cost category requires prior approval by the federal sponsor. The Director of Sponsored Research Administration facilitates seeking prior approval at

the request of the PI and, only after approval has been received, can participant support be rebudgeted.

Rebudgeting/Grant Budget Amendments

Vassar's Director of Sponsored Research Administration and the Senior Accountant for Grants & Restricted Funds work together within established procedures for initializing, approving and processing budget revision requests on sponsored projects.

Grant budgets are reviewed internally and by sponsors for compliance with governing cost principles and policies, many of which are unique to the funding agency or award type. Approved budgets are consistent with sponsor requirements, and many post-award budget revisions require prior approval from federal sponsors.

Some sponsors allow PIs to revise budgets without prior approval while others require approval when re-budgeting across spending categories or when changes exceed a specified percentage of the award amount. PIs who are considering budget amendments should consult with the Grants Office in order to determine whether prior approval is required. The [Research Terms and Conditions Appendix A Prior Approval Matrix](#) is a resource for PIs.

For general amendments, which do not include restricted categories or require prior approval by the funding agency, the Director of Sponsored Research Administration works directly with PIs and may, as needed and depending on the scope of the change, request a written budget revision request. For those amendments that *do* require prior approval, the Director of Sponsored Research Administration requires a written budget revision and justification email that reflects a line item increase/decrease of funds, and the justification must adequately support the need for the revision. A sample budget revision and justification letter is provided below.

The Director of Sponsored Research Administration then reviews the request, facilitates notifications/requests or similar communication with the funder, as warranted, and, once approval is secured, the Senior Accountant for Grants & Restricted Funds updates the approved budget in Workday to reflect the approved change(s).

Sample: PI [name] on Grant [title and number] proposes to redirect \$XX,XXX from Participant Support to other project needs.

The original budget planned for pre-matriculant students' participation in on-campus research during the summer before their first undergraduate year, and funds were requested for travel, food, lodging, and stipends. The experience was moved to an online environment due to [describe unique situation], and none of those expenses were incurred. Despite the limitations and reformatted experience, the session was successful and provided a strong foundation for participants.

As this was the last summer of the grant project period, the PI is requesting to reallocate \$XX,XXX of remaining Participant Support as follows: [describe line item revision request].

Cost Transfers

Cost transfers are adjustments made after charges to College or sponsored projects were originally recorded. The PI is responsible for:

- Initiating and approving charges to sponsored projects.
- Regularly monitoring grant accounting records and financial reports and reviewing financial reports on a timely basis to establish the allowability of all entries and to minimize the need for cost transfers. Regular budget and expenditure monitoring and correcting cost overruns must be managed by PIs from the day that awards become active until they are terminated, and no less frequently than quarterly for the duration of the project period.
- Initiating any necessary corrections or cost transfers, consistent with this policy. Cost transfer documentation should be submitted to the Director of Sponsored Research Administration. Additionally:
 - Cost transfer requests to address corrections of clerical or bookkeeping errors should be requested within 90 days following the end of the month in which the original charge was posted. Cost transfer requests that propose to move costs from one project to another solely to address cost overruns cannot be approved.
 - Cost transfer requests should be submitted with adequate documentation (such as Workday reports or related emails) with respect to the amount and justification.
 - Requests for correction of payroll errors must be made within 90 days following the end of the month in which the original charge was posted. All salary charges to federal sponsored agreements must be distributed only to the sponsored agreements that benefited from the associated services. Payroll correction requests submitted after payroll compensation confirmation forms are certified are not allowed.

The Director of Sponsored Research Administration is responsible for reviewing all cost transfer requests. Late cost transfers to sponsored projects - those greater than 90 days following the end of the month in which the original charge was posted - will not be permitted except in extenuating circumstances. For cost transfers when the original expense was applied more than 90 days following the end of the month in which the original charge was posted, Principal Investigators (PIs) must provide a detailed statement explaining the extenuating circumstances that might warrant an exception. The roles and responsibilities of personnel involved in approving late cost transfer requests are as follows. The Director of Sponsored Research Administration reviews justification for cost transfers submitted more than 90 days past the end of the month of the original charge date, in consultation with other offices as needed. If the Director of Sponsored Research Administration approves the late cost transfer request, it is then forwarded to the Senior Accountant for Grants & Restricted Funds, along with all related documentation. After the Senior Accountant for Grants & Restricted Funds reviews and approves, the Senior Accountant for Grants & Restricted Funds processes the cost transfer in Workday and maintains all documentation in the respective Workday award to ensure availability for audit or other review.

All expenditures to a sponsored agreement are subject to review by audit agencies. Vassar College may hold Principal Investigators personally responsible for inappropriate or unauthorized expenditures.

Modifications in Project Scope, Objectives, or Key Personnel

As projects progress, there may be changes in the scope, objectives or key personnel that meet the threshold of significance (such as a reduction of effort of 25% or more from the level that was approved at the time of award) for requiring prior approval by the granting agency. Procedures for requesting a project modification vary from one agency to another, so it is important to understand and follow agency procedures. The Director of Sponsored Research Administration will assist PIs in determining whether prior approval is needed and seeking it, if so.

Grant-Funded Domestic and Foreign Travel

Grant funds may be used to cover the costs associated with travel and subsistence associated with the award, including transportation, meals and lodging. [Vassar's Travel and Entertainment Policy](#) governs all domestic and foreign travel for grants. In the case of federal grant-funded travel, the following additional guidance should also be followed.

- Like all other expenses charged to federal grants (both prime awards and subawards), travel charges are governed by the cost principles of the Federal Office of Management and Uniform Guidance and, therefore, must be:
 - Allowable under both the provisions of the Uniform Guidance and the terms of a specific grant;
 - Allocable – directly associated to a project with a high degree of accuracy; and
 - Reasonable – reflects what a “prudent person” would pay in a like circumstance.
- Travel is allowable as a direct cost on a federal award, therefore, *only* when such travel will provide direct benefit to the project.
- Generally, the approved budget should include foreign or domestic travel costs; whereas budget revisions are allowable, PIs should consult with the Grants Office before charging travel expenses when the budget does not explicitly allow for it.
- Whenever possible, PIs or senior personnel who are traveling should retain and attach in Workday the conference or meeting agenda when expense reports are submitted, and the following information should be clearly indicated in the memo line in Workday:
 - Name of all person(s) traveling, including students
 - Conference title and/or purpose of travel (i.e., meeting with collaborators to discuss [project title])
 - Dates of travel
 - Place of travel
 - List of meal attendees, where applicable
- **Original receipts for all purchases, including transportation, lodging, and meals must be kept and submitted in Workday with expense reports, etc.** Whereas Vassar allows employees to submit a [missing receipt affidavit](#) when a receipt is lost or otherwise unavailable and all measures to obtain another have been exhausted, the affidavit should not be used for federally-funded grant purchases or expenses. Unless a senior officer approves the use of a missing receipt affidavit, receipts must be provided for all purchases on federally-funded grants. Failure to produce a receipt and secure senior officer approval may result in non-reimbursement.
- When traveling domestically, PIs and all other travelers are expected to choose the lowest priced airfare available at the time of booking (typically economy-class travel). The

traveler can use a preferred airline, when available *and* when it satisfies the low-cost requirement. Commercial airfare costs in excess of the basic least expensive unrestricted accommodations class offered by commercial airlines are unallowable except when such accommodations would:

- Require circuitous routing (e.g., multiple stops or layovers);
- Require travel during unreasonable hours (e.g., “red eye flights”);
- Excessively prolong travel;
- Result in additional costs that would offset the transportation savings; or
- Offer accommodations not reasonably adequate for the traveler's medical needs.

PIs must justify and document these conditions on a case-by-case basis in order for the use of first-class or business-class airfare to be allowable in such cases, and must have senior officer approval *before* the charges are incurred.

- Air travel: U.S. carriers should be used for all domestic air travel. Air travel to a foreign country must be on a U.S. carrier, if available, in line with the requirements of the [Fly America Act](#). Please contact the Director of Sponsored Research Administration if you plan to purchase airline tickets for foreign travel on a federal grant award in order to ensure you are aware of all requirements.
- Entertainment – Costs of entertainment, including amusement, diversion, and social activities and any associated costs, are unallowable.
- Memberships, Subscriptions and Professional Activity – Generally, membership dues, subscriptions and professional activity costs may not be charged directly to federal grants unless included in the approved budget. The cost of individual memberships or subscriptions *is* allowable when fully justified in sponsored-approved grant applications and/or under the following circumstances:
 - Required for attendance at conference and/or to offset the registration fees, accordingly;
 - Required for participation as guest speaker at a conference or symposium; or
 - Required to distribute technical information or to publish research results.

Tax-exempt Status

Vassar is exempt from taxes in the states of New York, New Jersey, Florida and Texas. PIs should contact accountspayable@vassar.edu to request a tax exempt form in order to take it to a vendor. More information about tax exemption and other frequently asked questions can be found [here](#).

Grant-Funded Employees and Compensation

Academic year grant support may be used for unpaid leaves or to extend sabbatical leaves. Academic year grant income, in combination with contractual salary, may not exceed 9/9 at 100% effort.

This funding must be for research and related activities and in an amount approved by the sponsor. The total compensation cannot exceed the institutional base salary, and the leave must otherwise comply with the terms and conditions of the award.

Procedure for Determining Eligibility of Retired Faculty as Research Professors

At the discretion of the Dean of the Faculty, the role of Research Professor may be designated for a faculty member who has retired from the regular professorial ranks at Vassar College and who requests the opportunity to continue performing sponsored research at the College.

This title is granted only for the duration of the sponsorship and solely at the Dean's discretion, who specifies the conditions of any appointment in a Memorandum of Understanding (MOU). Multiple issues are considered before Research Professor appointments can be made, including any resources that may be needed from Vassar's Grants Office, Dean of Faculty Office, and general facilities.

The initial step in the process is to submit to the Dean of the Faculty a request for a Research Professor appointment, which describes the:

- 1) Title and sponsor of any grant(s);
- 2) Funded project period (start and end dates);
- 3) Budget justification for the project period; and
- 4) Project activities/tasks to be performed during the approved appointment period.

Approved appointments will be documented in an MOU, which will clarify compensation, if any is included in the grant budget, and outline the Research Professor's scope of responsibilities and legal acceptance of administrative/contractual responsibilities related to being an "agent" of the College.

The signed MOU, in concert with any sponsor terms and conditions related to the Research Professor's grant, establish the Research Professor's role as an investigator on a sponsored project.

Visiting Faculty & Researchers

Similarly, at the discretion of the Dean of the Faculty, the role of visiting researcher or research associate may be assigned for the duration of the grant. The conditions of any appointment are detailed in a letter or MOU, and multiple issues are considered before appointments can be made, including any resources that may be needed from Vassar's Grants Office, Dean of Faculty Office, and general facilities.

Stipends

Stipends are payments made to an individual that are not contingent on the individual completing a specified activity. They are allowable only when the purpose of the grant is to provide training to selected participants and/or the charge is approved by the sponsoring agency in the participant support costs category.

Reassigned Time on Grants

Faculty members who intend to seek a course reduction in their regular teaching load may be eligible to include funds to cover associated reassigned time in their grant application budgets. With approval from the respective department chair and Dean of the Faculty, PIs should calculate reassigned time for one unit at 12.5% of IBS and also include 38% fringe and indirect costs, as appropriate, in the budget. If approved as described above, two units of reassigned time

should be budgeted at 25%, and three units at 50% of IBS, also with commensurate fringe and indirect.

Subawards/Subcontracts

Vendor/Contractor vs. Subrecipient: Guidance on Appropriate Classification

Vassar's Grants Office should be consulted by PIs before entering into a relationship with another entity under a grant or sponsored award in which the other entity will provide goods or services or substantive, programmatic work so that a determination can be made as to the nature of the relationship and type of agreement required to document it. This decision determines the allocation of responsibilities and influences the appropriate application of indirect cost rates.

Subawards/Subrecipients

A **subaward/subrecipient** relationship is appropriate when, among other things, substantive, programmatic work or an important or significant portion of the research program or project is being undertaken by the collaborating entity, the entity retains some element of programmatic control and discretion over how the work is carried out, and a principal investigator has been identified at the entity and functions as a "Co-Investigator."

Subaward agreements should include a detailed scope of work and a budget that specifies salary, fringe, supplies, and other direct costs, as well as appropriate F&A costs.

Contractors/Vendors

A **contractor** relationship (including that of an individual consultant) is appropriate when, among other things, the entity is providing specified services to a range of customers and to support the research, but does not significantly participate in the design or conduct of the research itself and is not directly responsible to the sponsor for the research.

The Grants Office works with PIs to determine the nature of the relationship and to evaluate the likelihood that a proposed subawardee may fail to comply with the requirements of the subaward. This risk assessment is conducted prior to entering into a subaward agreement and, according to the level of risk, monitored throughout the project period.

Definition of Low-Risk and High-Risk Subawardees

Low-risk subawardees include collaborators with current annual single audits containing "unqualified" opinions on their financial statements and which have no reported material weaknesses in their internal controls. High-risk subawardees are those which have not completed annual single audits or whose audit results have demonstrated weaknesses in administering federal funding, a history of failing to adhere to applicable provisions.

Special Actions for High-Risk Subawardees

When the Grants Office and PI have categorized a subawardee as "high-risk," they first decide whether a subaward will be issued and, if so, what specific terms and conditions (as per Uniform Guidance section 200.207) will be included in the subaward and what additional oversight might be necessary to adequately monitor the subaward. Additional monitoring requirements include more frequent reporting, shorter periods of performance and more detailed invoices and backup documentation). Vassar's Grants Administration and Management team, which includes a

representative from the Dean of Faculty Office, has the responsibility of assessing/verifying risk and monitoring subawards.

The Principal Investigator is a key partner with the Grants Administration and Management team in monitoring the performance of subawardees on grants. Principal investigators should:

- Maintain active lines of communication with subawardees, including site visits where warranted;
- Ensure that the scope of work/goals and objectives are achieved;
- Review and approve all technical reports from subawardees;
- Review and approve for payment by the Director of Sponsored Research Administration all invoices to ensure charges are reasonably reflective of the work performed. Send approved invoices to Grants Accounting for processing; and
- Approve final invoices in a timely manner and for closeout.

Proposed subawardees must complete and sign Vassar's subaward agreement, and ensure compliance with the terms and conditions of the federal award. Additional requirements may be imposed, such as identification of any required financial and performance reports. In order to meet their Single Audit Requirements, subawardees must provide a complete copy of their most recent independent audit, or a link to their record on the Federal Audit Clearinghouse.

Closeout of Subawards

Subawardees are required to submit a final invoice clearly marked FINAL to Vassar no later than 45 days after the end of the subaward period of performance or such other date as specified in the agreement. Payment for subawardee's invoices submitted later than 45 days after the end of the subaward might not be paid. PIs and departments are responsible for assisting the Director of Sponsored Research Administration and the Senior Accountant for Grants & Restricted Funds in obtaining final closeout information – including invoices – from their subawardees.

A subaward is closed out when its period of performance comes to an end and after the collection and review of the subawardee's final reports, verification of subaward data and incorporation of the subawardee's research results into all technical reports to the sponsor, as warranted.

Equipment Acquired with Federal Funding

Equipment purchased with federal grant funds must be in the approved budget, necessary for the sponsored project, not already available, and used for the award aims during the funded period. Equipment needs may shift over the course of a funded project, and PIs should consult with the Grants Office to discuss options and requirements before making any purchases or changes.

Federal funders, for example, scrutinize equipment purchases made too close to the end of the project period end date. Vassar requires PI justification in those and other instances so the institution can document that all cost principles are adhered to (necessity, allocability, etc.). **In all instances where PIs are seeking to purchase federally funded equipment within six months of the project end date, PI justification must be provided and senior officer approval is required.**

Some changes require prior approval from the federal sponsor; NIH, for example, requires prior approval when equipment represents a change of scope ([NIHGPS 8.1.2.5](#)), sometimes indicated by [significant rebudgeting](#) and/or when equipment over \$25k per unit wasn't budgeted. Equipment acquired with federal funding is managed in accordance with federal regulations, sponsor requirements and College policies. PIs should ensure pre-acquisition screening of major equipment to avoid unnecessary purchases. Ownership for equipment purchased with grant funds rests with the College unless otherwise specified in the sponsor agreement. During the award period, federally funded equipment should not be used for other projects without prior sponsor approval. At such time as it is no longer needed by the sponsored project, equipment may be made available for other programs funded by the same sponsor or other federal agencies. In those instances when a PI would like to request that equipment be transferred to his or her new institution, the Grants Office can assist with seeking sponsor and institutional approval as well as the transfer process, if approved by both.

Reporting Loss, Damage or Theft

PIs should report to the Grants Office any loss, damage or theft of equipment acquired with federal funding. PIs should also alert the Grants Office if equipment needs to be moved for any period of time. When a PI wishes to dispose of items of equipment funded by a federal grant, disposition restrictions must be researched and resolved by the Senior Accountant for Grants & Restricted Funds and Director of Sponsored Research Administration. Sponsor approval may be required prior to disposal.

Physical Inventory

Tagging and recording of federally-funded grant equipment is the responsibility of the Grants Office.

In accordance with Uniform Guidance, the Grants Office performs a physical inventory of equipment and reconciles with the inventory records every two years, verifying the following information for each asset:

- Location
- Status
- Condition
- Description
- Manufacturer
- Model No.
- Year manufactured
- Serial No

Purchasing Computers and Other "Equipment" under \$5,000 Per Unit

Vassar has a separate spend category for items under \$5,000 each, "Grant Funded Equipment - Non Capital (SC7019), that may still be considered equipment, and this should be used rather than the traditional equipment spend category for such purchases. All computer purchases with grant funds should be necessary for the funded project; while the Uniform Guidance states that computing devices are allowable as direct costs and do not need to be *solely* dedicated to a project – indicating that some non-project use is acceptable – the *predominant* use of the computing device should be on the project. PIs must first complete the [New Computer Request](#)

[form](#). This ensures that computers are compatible with Vassar College systems and can be integrated, accordingly. All computers are considered to be non-equipment items unless they are over \$5,000 per unit.

Grants Accounting Procedures and Support

The Senior Accountant for Grants & Restricted Funds financially administers the College's portfolio of grant-funded research and maintains related policies and procedures. Providing the highest level of financial stewardship of College resources, the Director of Sponsored Research Administration serves as advisor and partner to the Senior Accountant for Grants & Restricted Funds and PIs in all matters of fiscal compliance and helps ensure that appropriate controls are in place.

All grants accounting transactions are handled within the Workday system, and business and routing processes are in place to ensure the review and approval of all grants-related transactions by the appropriate personnel. A general ledger expense code list is available through Accounting Services. NSF and other government grant funding is segregated within appropriate object class codes in Workday and according to affiliated spend categories.

Vassar's Accounting Services Office maintains [on-line grant-related information about Workday](#), a robust [set of forms and documents](#) as well as additional related [policies and procedures](#), and [Frequently Asked Questions](#), all of which can also support PIs and designees in grants accounting.

Initiating Expenditure Requests & Expenditure Approval

Expenses are initiated and approved through Workday. After the PI or designee initiates a transaction in Workday, it must be approved by the Principal Investigator before being routed to the Senior Accountant for Grants & Restricted Funds for review and approval. For federal grants, after this initial review ensures that the expenditure is included in the restricted Workday budget and that sufficient funding is available, it is then routed to the Director of Sponsored Research Administration for review to ensure that the expense is reasonable, allocable to the specific project, and conforms to any limitations of the cost principles or the sponsored agreement. If any of the above are not satisfied, the expense is sent back to the PI, documenting what is required, and requesting additional information. After all of the above conditions are met, the expense can be approved by the Director.

Established levels of approval* for requisitions and expense in Workday are as follows:

\$0 - \$1,000.00	Cost Center Manager
\$1,000.01 - \$5,000	Cost Center Manager + Direct Report to Senior Officer
\$5,000.01 - \$50,000	Cost Center Manager + Direct Report to Senior Officer + Senior Officer
\$50,000.01+	Cost Center Manager + Direct Report to Senior Officer + Senior Officer + CFO

*Approval steps do not duplicate. For example, if the cost center manager is also a direct report to a senior officer, the approval will route one level above even at a lower dollar threshold or to the requestor's manager depending on the case. PIs can check approval steps by using the "Process" tab within a completed requisition or expense report. For the requisitions of goods and services, the Purchasing Department and Policy should guide PIs as described below.

Ongoing Budget and Expenditure Monitoring

The Director of Sponsored Research Administration prepares and distributes to PIs and project directors grant budget to actual expenditure reports on a quarterly and/or as-needed basis. This supports project directors and principal investigators in their management of grant budgets, including monitoring burn rates, re-budgeting where necessary, and planning for and requesting no-cost extensions, and ensures that all of these activities are accomplished in line with sponsor requirements and regulations. Specifically, the roles and responsibilities of personnel involved in monitoring project budgets against actual costs and the frequency for such review are as follows:—The Senior Accountant for Grants & Restricted Funds monitors project budgets against expenditures at the time of expense transaction review and approval.—The Director of Sponsored Research Administration monitors project budgets against actuals on a quarterly basis and works closely with PIs to ensure effective ongoing budget management.

Policy and Process for Uniform Guidance Compensation Confirmation¹

On an annual basis, Vassar College principal investigators (PIs) on federally funded awards must confirm that the salaries and wages of individuals charged to their respective projects are reasonable and accurate based on the work performed.

PIs must regularly review compensation reports to ensure that final amounts charged to federal awards are accurate, allowable, and properly allocated. This regular monitoring of payroll charges throughout the budget period is central to Vassar's compliance program.

The Director of Sponsored Research Administration reviews payroll reports regularly and also performs bi-annual reviews to ensure that procedures for Payroll Certification on Federally Sponsored Projects are being followed as intended. The Director of Sponsored Research Administration then follows up on any irregularities or deficiencies that are identified in order to determine and address the cause.

Process and Objectives

- Alignment Throughout Award Lifecycle:

¹ Vassar's policy and process are in line with Uniform Guidance (UG) Compensation Compliance. UG FAQ .430 RE: Audit agency approval for changes: Institutions can develop solutions that meet the requirements in paragraph (i) and reduce the burden related to their current process whether they be incremental or more significant, including complete elimination of current systems. The changes to the UG "allow for alternatives to the current requirements that can provide an even higher standard of accountability without burdensome process requirements." From the UG Preamble: "The focus on final guidance on overall internal controls mitigates the need for reporting/certification." Source for all quotes and guidance: NCURA Philadelphia Subregion Webinar *Understanding and Navigating Compensation Compliance under the UG*, July 15, 2019.

- Pre-Award collaboration with the Dean of the Faculty's Office such that all proposals and budgets submitted include correct Institutional Base Salary and any/all reassigned time has been approved by the department chair and the Dean.
- At the time of award/acceptance, the budget is reviewed to confirm that salaries and wages are estimated correctly and reasonable for the work that will be performed.
- As the project moves forward, monthly reports of payroll charges are provided to the PI for informational purposes and review, which may be used to trigger reallocations of payroll and any necessary cost transfers. Payroll charges are reconciled by the PI, via a review of payroll reports, to ensure changes to payroll allocations or cost transfers are executed as intended on the project.
- Once final amounts are confirmed, compensation charges become award expenditures (recorded as allowable, allocable, reasonable, benefiting the project, and consistent with institutional policy), and the amounts can be relied upon for accuracy of financial reporting.
- Regular review of project expenses will decrease frequency of cost transfers and will increase timeliness of salary changes.
- All salary adjustments must be made in a timely manner. Corrections to payroll allocations that were previously certified or made in error should be infrequent, performed within a reasonable time period (within 90 days of discovery), justified in writing by the PI and fully justified through a description of how the error occurred and how it will be prevented in the future. Adjustments beyond the 90-day period must undergo elevated institutional approval.
- Salaries of employees used in meeting cost sharing or matching requirements on federal awards must be supported in the same manner as direct charges.
- Specific review and approval procedures exist for instances of Non-IBS "Extra/Other" compensation received by an individual and paid on a federal project.

Purchasing with Federal Grant Funds

All items that cost \$5,000 or more per unit and that are purchased with federal grant funds must be purchased through Workday by creating a requisition; no equipment should be purchased with a Procurement Card.

Standards for purchasing goods and services with federal grant funds are established by the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (in brief, the Uniform Guidance). Given these requirements, and the multiple steps required in Workday for purchasing equipment, we strongly encourage PIs to work closely with the Grants Office and Procurement Department well in advance of any deadlines for purchasing items of \$5,000 or more per unit and to adhere to the following. A checklist has been provided at the end of this document to assist PIs.

- Follow Vassar College's relevant [purchasing policies and procedures](#).
- Purchases must be necessary, not duplicative, and of direct benefit to the federal grant.
- Where appropriate, an analysis of lease and purchase options should be performed to determine the most economical and practical procurement.
- The assessment and selection of specific purchases should ensure open competition, objective contractor performance, and elimination of unfair competitive advantage.

- PIs must have disclosed any potential [Conflicts of Interests](#) and may not participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict exists.
- Purchases made with Federal award funds should provide a preference for items produced in the United States when possible. Justification should be provided for procurement of non-domestic materials and equipment to the extent practicable.
- To the extent possible, purchases should be made using minority businesses, women's business enterprises, and labor surplus area firms.
- Transactions must be supported by original, detailed, and unduplicated documentation.
- Purchases must remain in aggregate and cannot be separated into multiple increments in order to bypass procurement threshold requirements.

Purchases and commitments that are not in compliance with these federal requirements will need to be returned, cancelled or paid for with department funds or other non-federal sources.

Federal methods of procurement:

- Micro-purchases (<\$10,000 in aggregate)
 - To the extent practicable, micro-purchases must be distributed in an equitable and reasonable manner to ensure fair and competitive pricing.
- Small purchases (\$10,000 up to \$250,000 Simplified Acquisition Threshold)
 - Price or rate quotations must be obtained in written format (which may include vendor price lists from public websites) from a minimum of three qualified vendors and included with the submission of the invoice when purchasing with funds; and
 - To the extent practicable, small purchases must be distributed in an equitable and reasonable manner to ensure fair and competitive pricing.
- Competitive proposals (above \$250,000 Simplified Acquisition Threshold)
 - Expected cost and price analysis must be done in advance for each purchase above \$250,000 (i.e. catalogued or published list price, historical or market pricing; comparison to similar purchases. Quotes must be obtained from at least three qualified sources; and any Requests for Proposals (RFPs) must
 - define the item or service specifications in order for the bidder to properly respond; and clearly identify all evaluation factors and their relative importance in the awarding process (i.e. pricing, timing, outcome specifications, references); and
 - Selection of proposal must be documented in writing, and included with the submission of the invoice when purchasing with federal funds; and
 - Contracts must be awarded to the most responsible vendor, whose proposal is most advantageous to the federal grant and the College.

Noncompetitive Proposals (Sole Source)

- PIs may conduct sole source procurement when one or more of the following circumstances apply *and* when they provide a thorough explanation of the circumstance(s) in advance of the purchase:
 - The goods or services are available from only one source provider.

- A public exigency or emergency will not permit a delay resulting from a competitive proposal.
- The federal awarding agency or pass-through entity has expressly authorized in writing or in an approved budget that the noncompetitive proposal requirement is waived.
- Competition is deemed inadequate after a minimum of two solicitations have been unsuccessful.
- The written sole source justification must be included with the submission of the requisition when purchasing with federal funds.
 - Sole source justification must explicitly identify which of the four criteria apply to the procurement method; and
 - Provide information that addresses justification for sole source procurement (i.e. only one known source; uniqueness of item or service; professional expertise; geographic limitations; etc.)

Procurement, Suspension and Debarment

- The Federal Government prohibits expending federal funds on goods and/or services from any entity Suspended or Debarred from doing business with the Federal Government. Procurement of goods and/or services with federal funds from a supplier or contractor should be checked for debarment before purchasing and/or awarding a contract or subaward.
- Vassar's Grants Office is responsible for checking [SAM \(System for Award Management\)](#) to see if a vendor is on the government list of debarred vendors prior to the approval of purchases on federal awards.
- The [SAM \(System for Award Management\)](#) website must also be checked to verify that an entity or agency has **not** been Debarred or Suspended prior to entering into a subaward with that entity or agency with federal dollars. The Grants Office documents the Suspension and Debarment verification for vendors and subawardees by including a screen print of the Exclusions search in the file. If the entity or agency is on the list, purchases, subawards or contracts are not approved until the entity or agency is removed from the Exclusions listing.
- In addition, after a subaward is awarded, the Director of Sponsored Research Administration must verify annually that the subrecipient is not listed on the [SAM.gov website](#) during the life of each federally funded subaward. If at any time, the [SAM.gov website](#) indicates the subrecipient has active exclusions, no invoice will be paid until the entity or agency is removed from the exclusion listing.

Managing Financial Conflicts of Interest and Ensuring the Responsible Conduct of Research

Principal Investigators and all senior personnel must not only ensure that prudent decisions are made in terms of grant expenditures, but also must disclose and/or be knowledgeable about a variety of policies and processes relating to the administration of their respective grant awards, including:

- Potential [Financial Conflicts of Interest](#);
- [Nepotism](#);
- [Responsible Conduct of Research](#);

- [Research Misconduct](#);
- [Dual Use Research of Concern](#); and
- [Export Controls](#).

Financial Conflict of Interest (FCOI) Policy and Process

Vassar’s [FCOI policy](#) supports and describes required reporting for investigators of any financial conflicts of interest and ensures compliance with the FCOI policy of federal agencies, including the National Institutes of Health (NIH).

The policy applies to each investigator who is planning to participate in or is participating in federally-funded research. Each investigator is required to: 1) understand and comply with this policy; 2) complete FCOI training; and 3) submit all known Significant Financial Interests (SFIs), as well as those of their spouse and dependent children, that reasonably appear to be related to the investigator’s institutional responsibilities, via Vassar’s FCOI report form.

In addition to all SFIs, Vassar also requires investigators to self-report information regarding any “other support” from both domestic and foreign entities. Other support means any and all resources and affiliations made available to an investigator in support of and/or related to all of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at Vassar. This includes, but is not limited to:

- in-kind resources;
- financial support through grants, contracts, and other awards;
- positions and scientific appointments;
- selection to “talents” or similar-type programs; and
- “gifts” where items or funds are received with conditions attached or deliverables expected in return.

International Engagement

NSF, NIH and other federal agencies require the disclosure of information about international activity and/or foreign engagement - defined as “an international activity as research, training, and/or education carried out in cooperation with foreign counterparts either overseas or in the U.S. using virtual technologies” and “the performance of a significant scientific element of the NIH-supported project outside of the United States,” respectively - on multiple forms and at all stages of grant-seeking and administration as part of their overall efforts with respect to monitoring potential foreign influence on sponsored research. The Grants Office is available to assist with questions about financial conflicts of interest disclosures, current and pending support, grant progress reports (RPPRs), and other required forms and processes.

If investigators disclose research-related SFIs, Vassar’s Assistant Dean of Grants Development and Administration works with the Associate Dean of the Faculty to determine whether the SFI is an FCOI and takes necessary actions to manage FCOIs pursuant to the Code of Federal Regulations.

Additional details, including enforcement mechanisms and specific FCOI training requirements and resources, are included in the FCOI policy and associated [financial disclosure form](#).

Grant Closeout

Grant projects and accounts are closed out by following a checklist of necessary tasks to ensure that all program and fiscal requirements have been met. Closeout occurs after the grant period ends and an extension is not requested or approved.

The PI is responsible for submitting the final program report, and the Grants Office confirms approval by the funding agency.

The Senior Accountant for Grants & Restricted Funds and Director of Sponsored Research Administration work together with the PI to confirm that all final quarter expenses have been charged to the approved budget categories and are reasonable, allocable, and allowable. Generally, the Director of Sponsored Research Administration, Senior Accountant for Grants & Restricted Funds, and PI should meet 60 days prior to the end of a grant to:

- Review account activity and encumbrance balances for closeout
- Confirm that all goods and services purchased with grant funds are received and/or completed prior to the end of the grant period of performance
- Ensure all compensation confirmation forms have been completed.
- Initiate payroll changes for staff that will be assigned to other projects or budgets The PI should also notify HR, as needed, regarding the termination of grant funding and associated employment status.

In general, and in line with the funding agency requirements, the PI, Director of Sponsored Research Administration, and the Senior Accountant for Grants & Restricted Funds work collaboratively to ensure that:

- All reports (including financial) have been submitted as required by the terms and conditions of the award;
- All obligations have been liquidated;
- Vassar has invoiced for or drawn down all allowable reimbursable costs;
- Vassar has refunded any balances of unobligated cash the sponsor advanced or paid and that are not authorized by the sponsor to be retained by the College for use in other projects;
- Any committed cost sharing has been adjusted, as needed;
- Any real and personal property acquired with federal funds or received from the federal government has been accounted for;
- All compensation confirmation report forms are completed; and
- Plans are in place to meet all retention requirements pertaining to the grant, in line with the College's records retention policy unless the sponsoring agency specifies a longer period.

Cash Management

The Senior Accountant for Grants & Restricted Funds, with support from Principal Investigators, is responsible for ensuring accurate and timely cash management and that all payments received for sponsored programs are accounted for in a manner consistent with sponsor requirements and Generally Accepted Accounting Principles. This includes payments received electronically (e.g. letter-of-credit-draws) and wire, or check.

Within Accounting Services, the Senior Accountant for Grants & Restricted Funds oversees all grant accounts in Workday and:

- Performs letter of credit drawdowns and/or submits and/or approves invoices in close collaboration with the respective PI;
- When Vassar is a sub-awardee, the Senior Accountant for Grants & Restricted Funds submits invoices to the prime;
- Follows up on outstanding receivables and delinquent accounts and identifies issues causing delays;
- Records payments to appropriate Workday accounts; and
- Prepares and submits financial reports to funding agencies detailing payments and expenses.

For federal grants, payment is received on a cost reimbursement basis, rather than at the time funds are authorized. The Senior Accountant for Grants & Restricted Funds is responsible for preparing and performing drawdowns, which are processed through the respective agencies' online payment systems based on the aggregate expenditure activity for expenses on the general ledger of the previous quarter *or* according to funding agency-specified timelines, as required. Reimbursement of Payments are made to the College via Automated Clearing House (ACH).

For non-federal sponsors or federal sponsors without a letter-of-credit relationship, the Senior Accountant for Grants & Restricted Funds prepares and submits invoices on a monthly basis (typically and not later than quarterly and/or depending on the billing terms and conditions established by the sponsor). The Senior Accountant for Grants & Restricted Funds monitors payments to ensure they are timely and accurately and applies them in Workday upon receipt.

Other payment methods for grants that are based on the terms and conditions in the award agreement (such as milestones or scheduled periodic payments) are monitored, accordingly, by the Senior Accountant for Grants & Restricted Funds to ensure that payments are received in a timely fashion, and in accordance with the terms and conditions of the award or contract.

Electronic Payments

The Senior Accountant for Grants & Restricted Funds identifies electronic payments recorded in the College's bank statement and applies the payment to the appropriate account in Workday.

Payments Received by Mail

Checks/payments from sponsors are processed by the Senior Accountant for Grants & Restricted Funds, in collaboration with the Office of Alumnae/i Affairs & Development (OAAD) when needed.

Documentation of Bank Deposits

Workday is the system of record in terms of maintaining documentation of bank deposits that are processed by the Senior Accountant for Grants & Restricted Funds.

Expenditures for a Sponsored Award Over-Expended

If a sponsored award is over-expended, the amount must be funded by the PI's department. The

Senior Accountant for Grants & Restricted Funds will work with the Director of Sponsored Research Administration of Grants Accounting, PI and department chair to identify a departmental source onto which the amount can be transferred.

Refunds

Before closeout procedures are being performed, it may be determined by the Director of Sponsored Research Administration that there are funds and work remaining. In those cases, the Director of Sponsored Research Administration will work with the PI to determine whether a no-cost extension is possible. Such a request will be supported by the Director of Sponsored Research Administration, if so.

When a no-cost extension is not an option and there are funds remaining, the Director of Sponsored Research Administration will review the terms and conditions of the award to determine the sponsor's policy on the disposition of remaining funds and recommend that the Senior Accountant for Grants & Restricted Funds process a refund, as necessary.

Operating Procedures for Award Cash Management Service (ACM\$) Drawdowns

The Senior Accountant for Grants & Restricted Funds is responsible for Award Cash Management Service (ACM\$) drawdowns. On a quarterly basis, and/or as necessary, the Senior Accountant for Grants & Restricted Funds prepares, secures Associate Controller approval for, and submits, after Controller approval, cash requests and adjustments to open awards via ACM\$ in order to ensure timely payment and funds status monitoring. After submission, the Controller certifies in ACM\$.

Vassar College's Measures to Protect the Research Community from Harassment

Title IX & EOAA

The Grants Office works closely with Vassar's [Office of Equal Opportunity and Affirmative Action \(EOAA\)](#), which is responsible for monitoring the College's compliance with Title IX and other related federal and state laws by investigating complaints of gender-based discrimination, including sexual harassment in accordance with the College's [Policy Against Discrimination and Harassment](#).

The EOAA oversees formal grievance and hearing procedures as described in the College Regulations, Administrative Handbook, and Faculty Handbook. The Grants Office regularly provides the EOAA with an updated list of all grant PIs and senior personnel to ensure that incidents can be reported appropriately and as required by funding agencies.

Goods & Services Procurement with Federal Funds Checklist for Items of \$5,000 or more

If your purchase is more than \$5,000 per unit, please consult first with the Grants Office and/or with the Procurement Department *before* initiating your purchase in Workday. Next, complete and attach in Workday this checklist, which was developed to help PIs and all relevant departments document compliance.

- I consulted with the Grants Office and/or Procurement Department on this purchase.
- I confirm I have no financial conflicts of interest related to this purchase.
- I confirm this is not a duplicative item or unnecessary purchase.
- I confirm that I requested information from the manufacturer about where the item was made and have considered the required preference for items produced in the U.S. to the extent possible.
- Consideration has been given to the vendor's/contractor's record of past performance, financial and technical resources, as well as whether the contractor is suspended or debarred from receiving federal funds.
- If this purchase is more than \$10,000 per unit: I have quotes (which may include vendor price lists from public websites) from a minimum of three qualified vendors and will include those with documentation in Workday.
- If this purchase is for equipment costing more than \$250,000: I have completed the expected cost and price analysis in advance (i.e. catalogued or published list price, historical or market pricing; comparison to similar purchases), and have obtained quotes from at least three qualified sources.
- If this purchase is for services > \$250,000: I have worked with Procurement to develop a Request for Proposals (RFPs) that defines the item or service specifications in order for the bidder to properly respond, and clearly identifies all evaluation factors and their relative importance in the awarding process (i.e. pricing, timing, outcome specifications, references); documented the selected proposal in writing; selected the vendor whose proposal is most advantageous to the federal grant; and will include all relevant documentation in Workday.

For Sole Source Procurement

I have provided adequate written justification in the memo line in Workday to explain how this purchase meets at least one of the criteria (please check all that apply):

- The goods or services are available from only one source provider.
- A public emergency will not permit a delay resulting from a competitive proposal.
- The federal awarding agency or pass-through entity has expressly authorized in writing and an approved budget that the noncompetitive proposal requirement is waived.
- Competition is deemed inadequate after a minimum of two solicitations have been unsuccessful.