

Member of The Texas A&M University System

SPONSORED PROJECTS ADMINISTRATION PROCEDURES MANUAL

Tarleton State University Sponsored Projects Administration Procedures Manual

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Section 1: Introduction

1.1 Purpose and Scope of Manual

The primary purpose of sponsored agreements managed by Tarleton State University is to further the instructional, research, and public service objectives of the university in a manner consistent with its status as an agency of the State of Texas.

All sponsored projects will be submitted through the Office of Research and Innovation (ORI), often assisted with proposal submissions by Texas A&M University Sponsored Research Services (SRS).

Through its acceptance of sponsored agreements, the university agrees to administer agreements in full compliance with federal, state, and other applicable regulations associated with performing sponsored activities. Funds received by a sponsor for a particular activity are restricted to that purpose. Various university offices share responsibilities for the administration of sponsored agreements in regard to the oversight of funds, personnel, and facilities involved in a sponsored activity.

This manual has been created to acquaint Investigators with Tarleton's ORI and to serve as a reference guide to the basic processes involved in obtaining and administering external funding. We hope this manual will serve as a useful guide for university faculty and staff, and we welcome any feedback concerning its contents. Please send suggestions to facultyresearch@tarleton.edu.

1.2 Types of Sponsored Projects

Sponsored projects are established when funds are awarded to Tarleton by external sources in support of research, instruction, training, service, or other scholarly activities, typically in the form of grants, contracts, or cooperative agreements. Tarleton accepts the award, and by doing so, assumes the obligation to provide deliverables in exchange for the sponsor's funding. Sponsored projects require separate accountability for the funds received.

Cooperative Agreements are grants that typically involve a significant level of sponsor participation in the administration and direction of the project.

1.3 Maestro Sponsored Project Online System

Maestro is an A&M online system that serves as a repository for records regarding sponsored projects. All sponsored projects at Tarleton are logged into the Maestro system to maintain a record of projects and route them for appropriate approvals per the Tarleton SAP 15.01.01.T0.01 Preparation, Review and Submission of Sponsored Projects.

Personnel are provided with access to Maestro appropriate to the functions for which they will need to access the system. Upon employees' hiring, automatic Maestro processes provide employees with the access most appropriate to their university roles. The Security Administrator will review the weekly employee changes report and revise the Maestro access roles accordingly.

Ad hoc access will also be updated on an as needed basis by the Security Administrator. Requests for changes to a user's access are completed via the Maestro Security Role Access Update Request Form (https://www.tarleton.edu/osp/documents/maestro-access-form.pdf) that includes the user's name, title requested role(s) changes(s), and rationale for requested role(s) changes(s). The Maestro Security Role Access Update Request Form must be approved by the Associate Dean for Research and Innovation or Associate Vice President for Research, or their delegate, before it is processed. Completed Maestro Security Role Access Update Request Forms will be stored in the university document repository per System and Tarleton document retention policy.

Maestro roles (as of this printing) are listed below and the positions to which the roles are typically assigned. There may be other positions to which the roles could be assigned, however, based on rationale. These exceptions will be documented in the completed Maestro Security Role Access Update Request Forms.

Note that changes to Maestro roles are listed in the most recent version of the Maestro User Manual, which shall take precedence over the roles listed below.

Current Role	Maestro Roles	
	(To be entered by Security Administrator)	
Researcher/Faculty	User Access - Dept Organization	
	Researcher (automatic)	
Department Head	User Access – Dept Organization	
	 Executive General Maestro User (automatic) Project Viewer Proposal Viewer Researcher (automatic) Researcher Reviewer 	
	Document Approver – Dept Organization	
	Organization Head	

Current Role	Maestro Roles	
	(To be entered by Security Administrator)	
Associate Dean	User Access – College Organization	
	 Executive General Maestro User (automatic) Project Viewer Proposal Viewer Researcher (automatic) Researcher Reviewer 	
	Document Approver – College Organization	
	Dean/Agency DirectorOrganization Head	
Dean	User Access – College Organization	
	 Executive General Maestro User (automatic) Project Viewer Proposal Viewer Researcher (automatic) Researcher Reviewer 	
	Document Approver – College Organization	
	Dean/Agency DirectorOrganization Head	
Administrative Assistant supporting	User Access – Dept Organization	
active grant project	 General Maestro User Project Viewer Researcher Researcher Reviewer Researcher Administrative Assistant 	
Budget and Records Specialist supporting active grant project	User Access – College Organization Executive General Maestro User Project Viewer Proposal Viewer Researcher Researcher	

Current Role	Maestro Roles
	(To be entered by Security Administrator)
Assistant or Associate Vice President	User Access – Member Organizaation
	Executive
	General Maestro User (automatic)
	Project Viewer
	Proposal Viewer
	Researcher (automatic)
	Researcher Reviewer
Vice President	User Access – Member Organization
	Researcher (automatic)
	General Maestro User
Other (completed in consultation	User Access
with approver)	(to be determined by role)
	Document Approver
	(to be determined by role)

Annual Review of Maestro User Access

Annually, between September 1 and November 1, the Security Administrator (SA) will also review the entire Maestro user access list for any new or existing employees for which access should be updated as detailed in the Sponsored Projects Administration Procedures Manual. The Security Administrator will follow the steps below to ensure all users have the appropriate level of Maestro access that is required for business use.

- 1. Within Maestro, the Security Administrator will generate the list of Tarleton users along with their last login date.
- 2. The SA will review the list to determine whether the user continues to require the level of access that is currently assigned or if the level of access needs to be updated based on the user's role at the institution. To facilitate this, the SA will compare the list of Maestro users to lists of faculty and leaders in the Academic Affairs division to determine whether each user requires the level of access that is currently assigned or whether it should be updated. The SA will consult Employee Services, the user's supervisor, or other university officials for more information, if needed, to make the determination. Note that all users will be reviewed, but particular attention will be paid to those users who last login date was more than 30 days prior to the review.

3. Based on the results of the review, the SA will make the necessary adjustments following procedures listed in the Sponsored Projects Administration Procedures Manual – revising access for those that require a different level of access than they are currently assigned and deleting users who no longer require access.

1.4 Key Areas of Responsibility for Office of Research and Innovation

The ORI is Tarleton's sponsored projects support office for both pre-award and post-award activities. The ORI should be consulted for all questions about sponsoring agency policies and/or procedures. The Grant Specialist within the ORI will be the central contact for Investigators concerning pre-award and post-award sponsored project administration.

All proposals for external funding of sponsored projects must be submitted through the ORI (or SRS as its delegate).

The ORI also offers the following services to Investigators as needed. The Grant Specialist will, upon request:

- Assist in identifying funding opportunities
- Review and interpret sponsor guidelines
- Review Budgets and Budget Justifications with assistance from Principal Investigator (PI) or Program Director (PD)
- Review proposals for compliance with funding guidelines and institutional policies
- Edit proposals for grammar/ make suggestions for strengthening the proposal
- Prepare representations and certifications
- Offer Maestro assistance and training
- Serve as liaison between Tarleton/PI or PD and sponsor
- Read / review terms and conditions of incoming awards and summarize within Maestro for easier award administration

When a proposal or contract is awarded, the ORI Grant Specialist, in coordination with the Grant Accountant in Business Services will:

- Coordinate informational "New Award Kick-off Meeting" with PI and support staff that includes pre and post award processes and individualized preview of project needs
- Negotiate award terms
- Prepare and negotiate sub-agreements to outside entities
- Assist with routine requests to sponsor (e.g., no cost extensions, re-budgeting requests)
- Assist PI / PD with transfers of active sponsored projects to or from another institution
- Facilitate internal grant awards
- Assist with day-to-day administration of the Export Control and Financial Conflict of Interest
- Set up project account(s)

- Monitor account(s) and determine allowability of costs
- Invoice sponsor
- Conduct internal and external financial reporting
- Close out account(s)
- Monitor time & effort

Section 2: Proposal Preparation and Submission

2.1 Identifying Funding Opportunities

Funding opportunities can be found in various places, including online databases like Pivot (https://pivot.proquest.com/funding_main) as well as via professional associations, federal sponsors, and others. Investigators are encouraged to sign up for automatic emails of funding opportunities from identified sources.

ORI staff are available to assist with identifying funding opportunities as well upon request.

2.2 Sponsored Guidelines and Proposal Forms

Once an Investigator has identified a funding opportunity, he or she should contact the ORI to begin the steps towards submitting a proposal. The ORI Grant Specialist will assist the Investigator in preparing a Notice of Intent (NOI) communication to our SRS representative who will then create a work plan by establishing a timeline, assigning responsibilities, and answering questions. The SRS representative will log a proposal into Maestro that, once completed, will be routed internally within the online system for university approvals prior to submission to the sponsor according to Tarleton SAP 15.01.01.TO.01 Preparation, Review and Submission of Sponsored Projects.

2.3 Preparing the Proposal

The proposal creation is the most important step of the grant process. The proposal requirements are determined by the sponsor and can be found in the sponsors' funding guidelines within the Request for Proposals (RFP) sometimes called Request for Applications (RFA). The guidelines are often very specific, down to page limitations, font sizes, margin widths, and organization of the narrative and budget. Some sponsors even provide templates that must be used in the submission. An Investigator is strongly encouraged to meticulously review the RFP to ensure that the proposal is created following the instructions precisely.

2.4 Project Budget

The budget is developed in conjunction with ORI (or SRS as a delegate) following the sponsor's guidelines as well as the applicable University, System, and Federal requirements. The ORI Grant Specialist will work closely with the Post-Award team when questions arise during the development of the proposal budget to ensure budgeted costs are *allowable*, *reasonable*, and *allocable* to the project.

Allowable costs are those categories of costs that can be charged to a sponsored project. Certain types of costs (e.g., liquor) are not allowable and may not be charged at any time; others may be restricted by the sponsor.

Costs are considered *reasonable* if a prudent person would have paid a similar amount for the item in the same circumstances.

Costs of goods or services are *allocable* if, based on the benefit they provided, they can be directly assigned to the award.

2.5 Compensation for Externally Funded Faculty

Compensation for grant-funded faculty is governed by Tarleton standard administrative procedure 31.01.01 T1, Compensation for Faculty Research and Service, in addition to system and federal regulations linked to this SAP. An Investigator's compensation cannot exceed the employee's Institutional Based Salary (IBS) as stated in his or her appointment letter. IBS includes compensation for instruction, public service, research, and other normal job activities but **does not** include fringe benefits, supplemental compensation, or any income earned outside of Tarleton. OMB Circular A-21, Cost Principles for Educational Institution 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

Students or other personnel will be compensated from externally funded projects at rates comparable to existing Tarleton rates. Investigators are encouraged to consult with Employee Services to determine compensation rates for projects. Investigators are encouraged to include allocations in the project budget to cover the Investigators' time, other personnel, including students, in addition to travel, goods, services, equipment and indirect cost.

Faculty Course Buy-Out

If a PI / PD or researcher is awarded a sponsored project that will require release from some of their teaching duties to participate on a project, the following guidelines have been established.

Faculty may use extramural funds to buy-out courses as follows:

The extramural funds must cover the percentage of annual salary (and the associated benefits) equal to 10% of their 9- month salary regardless of normal teaching load of the particular faculty member. For 12-month faculty, the cost of a course buyout will be 10% in a given academic year.

This percentage is based on the TAMUS designation that one course equivalent to 20% effort for a full-time faculty in any given semester, or 10% in a given academic year.

A course buy-out does not carry the privileges of a sabbatical leave. Participation in the program should in no way reduce the campus service and attendance responsibilities of the faculty member. The faculty member must remain on campus for the duration of the buy-out except when standard leaves of absence are granted within policy.

2.6 Facilities and Administrative (F&A) or Indirect Cost (IDC) Rates

System Policy <u>15.01.01</u> Sponsored Agreements—Research and Other, section 8.2 & 8.3 directs Tarleton to establish procedures to recover all F&A or IDC based on the rates negotiated with the United States Department of Health and Human Services. Any exception, such as if a sponsor has a written policy of paying a specific F&A rate for all similar agreements regardless of which institution or site is the recipient of the funding, requires an explanation be included in the internal routing documentation. In the case of a restriction on F&A costs by the sponsor, a copy of the sponsor's written policy must be included with the package in Maestro.

Tarleton's most recent F&A rate agreement may be found on the <u>Tarleton Faculty Research</u> web page.

Any voluntary requests (i.e., those not imposed by the sponsor) to waive or reduce F&A on projects is considered a type of cost share and must be captured within the accounting system. To be captured there must be an alternate account to which the charges will be expensed. For example, this cost share can be expensed from the Investigators' portions of the indirect costs or another's such as the Dean's or Department Head's portion of the IDC upon approval. The proposed waiver must receive internal approvals within the IDC Waiver module in Maestro prior to submitting the budget to the sponsoring agency. Routing of IDC waivers must be processed prior to the final project routing process in Maestro.

Note that waiving F&A costs results in two undesirable consequences:

- 1. The F&A costs incurred by Tarleton will not be recovered for the particular project activity, which results in no compensation for sponsored project duties by the following, including but not limited to the ORI, Finance & Administration, Dean's Office, and the project Investigators.
- 2. It imposes an undesirable impact when future F&A rates are negotiated. Unrecovered F&A costs cannot be included in future negotiations of the F&A cost recovery rate.

Applicability and duration of waived F&A

An F&A waiver will apply to the project and for the proposed amount of the waiver for the noncompeting period of the project provided there is no material change in the project that affects the basis on which the waiver was approved. The IDC (F&A) waiver module can be found within the Maestro system.

2.7 Financial Conflict of Interest in Sponsored Projects

The System Policy 15.01.03 Financial Conflict of Interest (FCOI) in Sponsored Research was designed to promote objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of research, regardless of the funding source, will be free from bias resulting from Principal Investigator/Project Director financial conflicts of interest. It applies to the PI, PD, and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research or research activities. This policy is not applicable to students unless a student receives compensation from the project for their research efforts (e.g., scholarship, salary, or tuition reimbursement). FCOI disclosure is required on an annual basis and within 30 days after acquiring a new significant financial interest. The disclosure requirement extends to covered family members as well. The FCOI training is required prior to the first disclosure by a covered faculty member. The Disclosures are completed through the Maestro system. Contact the ORI Grant Specialist if you require assistance with the disclosure or understanding the requirements. See System Policy 15.01.03 Financial Conflicts of Interest in Sponsored Research and Tarleton policy 15.01.03 T1 Financial Conflicts of Interest in Sponsored Research for additional information.

This policy is distinct from and in addition to the general System Regulation 31.05.01, Faculty Consulting and External Professional Employment, which applies to consulting and external professional employment by faculty members that is directly related to their academic and professional discipline.

2.8 Submitting the Proposal

The PI / PD must have a current FCOI Disclosure on file in Maestro before a proposal will be submitted to a sponsor. All proposals and/or applications for external support must be reviewed by ORI or its designee prior to submission to the sponsor.

The review process applies to all grant and contract proposals. It also applies to pre-proposals or other preliminary grant applications, such as concept papers, if they involve budget figures or a commitment of institutional resources.

Only the AVP for Research or designee has institutional signature authority for sponsored project proposals. Even when a funding agency's electronic system gives the PI / PD authority to submit their own proposals, they must be routed through the ORI for review prior to submission. Likewise, proposals that do not require an institutional signature must still be routed through ORI before submission to the funding agency.

No PI / PD is authorized to sign on behalf of the university.

Adherence to the suggested proposal submission date of 5 days prior to the agency due date is strongly encouraged. Proposals need time to be reviewed by the ORI, captured into Maestro for electronic routing, and approved by the Investigator's Department Head and Dean.

Meeting the suggested lead time may also provide the ORI or its designee the opportunity to submit the proposal early, which can help avoid last-minute electronic submission issues.

For the occasional situation when Investigators are unable to meet the 5-day lead time, they are encouraged to contact the ORI as soon as possible. The ORI will work with the PI to submit the proposal if reasonably possible.

Note that proposals that are either sent to a sponsoring agency without ORI review or have been provided to the ORI with less than 24 hours to review, Tarleton reserves the right to:

- withdraw the proposal
- not accept the award if funded, or
- renegotiate the terms and conditions, budget, resources, etc., before accepting the award

2.9 Proposal Revision and Resubmission

If a proposal is initially not funded, we strongly encourage Investigators to request the reviewers' comments and seek feedback from the applicable program officer(s). If the sponsors' comments are encouraging regarding resubmission, the Investigator's chances of success on a resubmission are enhanced. In future submissions, the Investigator(s) is encouraged to:

- Respond specifically to the reviewers' comments in the narrative of the revised proposal
- Point out changes made to strengthen the proposal in the areas judged to be weak, and clarify information that may have been misinterpreted in the initial review
- Work closely with the program officer and be willing to rethink aspects of the project based on the feedback. The ORI can assist with crafting the resubmission to address the reviewers' comments

Section 3: Award Negotiation, Acceptance, and Establishment

3.1 Negotiation and Award Notification

Receipt of Award Notice

Award notices are usually directly sent to the ORI, but PI/PDs should forward any award notification to the Grant Specialist to ensure receipt. PI/PDs are not authorized to accept an award on behalf of the institution.

Negotiation of Agreement or Contract

Post-award or the Grant Accountant, in the TSU Business Services office, facilitates actions requiring agency approval, such as contract or agreement negotiations and execution, budget reallocations, changes of scope of work and time extensions. TSU's post-award accounting has prepared **Section 5: Managing the Award – Financial** to assist in the financial administration of the project award. Investigators are encouraged to frequently consult the following post-award financial section during the project period and to contact the Grant Accountant with any questions that they have.

When the ORI receives an award notice from a sponsor for a particular proposal, the notice is forwarded to the Grant Accountant, Grant Specialist, and PI. The Grant Accountant reviews the notice to determine if it is new or an amendment to existing award. If the award is determined to be new, the Grant Accountant matches the award notice to the existing proposal in Maestro and determines steps required to execute. If the notice is a modification of an existing award, the award document is uploaded to the project in Maestro, and modifications are made in Maestro and FAMIS to update the project according to the modification.

For new award notices, Maestro proposals are searched to locate the corresponding file. The sponsor is contacted if the agreement or contract does not accompany the award notice.

The Grant Accountant and Contract Specialist negotiate acceptable terms and conditions based on The Texas A&M University System Regulation <u>15.01.01 Sponsored Agreement – Research and Other</u> and Tarleton State University's Standard Administrative Procedure <u>15.01.01.TO.01 Preparation, Review and Submission of Sponsored Project</u>. Reviews and negotiations are performed before entering into a sponsored agreement to ensure the University can fulfill obligation requirements and is able to comply with the terms and conditions as a State Agency of Texas. Per System Policy <u>25.07 Contract Administration</u>, section 3, research contracts, grants, and agreements do not require board approval for execution if the award amount is less than \$500,000.

Once the final draft of the agreement or contract is acceptable to all parties, the document is routed and reviewed a final time by the Grant Accountant, Contract Specialist, Accounting Manager, Assistant Vice President of Finance and Administration, Vice President of Finance and Administration (VPFA) and President, required by the <u>delegation of authority</u>. After final review, the document is signed by Tarleton's authorized representative.

The partially executed agreement or contract is sent to the Sponsor by the Grant Accountant who waits for full execution.

3.2 Establish Grant Account in FAMIS based on Award Documentation

To establish a new account number for the grant, one of two processes is followed based on whether or not the proposal was routed in Maestro.

Proposals Routed in Maestro

Upon award, if the proposal has been routed in Maestro, the routing path is used as documentation of approvals in place of manual routing signatures. If this is the case, the Departmental Administrator or the Grant Accountant fill out a new account request form, attached to an email addressed to AccountingServices@tarleton.edu, and include the signed agreement or contract, a copy of the routing log in Maestro, and any other useful documentation.

Proposals or Awards <u>Not</u> Routed in Maestro

If the Maestro proposal process was not used during the proposal phase, a new account request form must be filled out by the Departmental Administration and manually routed for signature and attached to an email addressed to AccountingServices@tarleton.edu, along with the signed agreement or contract, a copy of the routing log in Maestro, and any other useful documentation.

Maestro routing follows the following path:

Principal Investigator (PI), Organization Head or Center Director, Member Research Officer, Dean/VP, AVP of Employee Services, Director of Office of Faculty Research, AVP of Research, Grant Accountant, Accounting Manager, VP of Finance and Administration and VP of Academic Affairs, and Provost (notification only).

Once the new grant account is established, the accountant sends an email notification with the new number to the PI, Grant Accountant, and department personnel noted on the form.

3.3 Compliance

Funding agencies and Tarleton require institutional approval for projects that will involve human subjects, vertebrate animals, biohazards, or other hazardous substances. Obtaining compliance approvals is the responsibility of the principal Investigator/project director.

FCOI disclosures must be current and Export Control procedures must also be considered for each project. It is the responsibility of the principal Investigator/project director to be aware of the policies regarding export control issues and notify ORI as to the applicability to the project. Additional instructions for acquiring the required approvals can be found on the research web page at http://assets.system.tamus.edu/files/policy/pdf/APPENDIX-B.pdf. In all cases, the

sponsored project cannot begin nor will access to grant funds be allowed without the necessary compliance approvals in place.

Export control regulations are federal laws that prohibit the unlicensed export of certain commodities or information for reasons of national security or protections of trade. For most research universities, the greatest concern centers on the "deemed export" of information, data, materials, items, and services having combined civilian and military uses, so-called "dual uses." Controlled information, data, materials, items, and services may be "deemed" to be "exported" in two ways, both of which are common activities at research universities:

Within the U.S.: Oral or visual communications with non-U.S. citizens through collaborative research, teaching or training, lab tours and related activities. Outside the U.S.: Unauthorized presentation of a controlled article, data, etc. or simply carrying such information electronically to and inside a restricted country.

Most sponsored project activity is excluded from export controls because of the general exception for "fundamental research" under the export control regulations. **The National Security Decision Directive 189** provides a definition of "fundamental research."

Export regulations apply to situations regardless of whether the activities were funded externally or not. Penalties are severe for noncompliance, including potential monetary and criminal punishment. The following link provides additional information concerning export control issues: https://www.tarleton.edu/osp/exportcontrol/compliance.html.

3.4 Sub-award Agreements

A sub-award is an agreement with another organization that will perform a substantive proportion of the project work and is issued when a PI requires the expertise of another entity to perform a portion of the scope of work on the project. The entity can be an A&M System member, federal, state, private company, non-profit, educational institution or other. Agreements with other TAMUS System members may be done outside of a sub-award.

A sub-recipient relationship is appropriate when:

- Substantive, programmatic work or an important or significant portion of the research program or project is being undertaken by the other entity.
- The research program or project is within the research objectives of the entity.
- The entity participates in a creative way in designing and/or conducting the research.
- The entity retains some element of programmatic control and discretion over how the work is carried out.
- The entity commits to a good faith effort to complete the design or conduct of the research.
- The entity makes independent decisions regarding how to implement the requested activities.

- A PI has been identified at the entity and functions as a "Co-Investigator."
- There is the expectation that the entity will retain ownership rights in potentially
 patentable or copyrightable technology or products that it produces in the course of
 fulfilling its scope of work.
- Publications may be created or co-authored with the entity.
- The entity provides cost sharing or matching funds for which it is not reimbursed by Tarleton State University (TSU).

Risk Assessment for Sub-award

The first step prior to initiating a sub-award on a sponsored project is to determine if a risk assessment is required for the sub awardee organization. Risk assessments are only completed for federal and federal pass-through sub-awards. Tarleton considers A&M System members to be low risk and has chosen not to complete risk assessments when collaborating within the A&M System.

If the sub-award is on a federal or federal pass-through award and is with an entity outside the A&M System, a risk assessment questionnaire is completed by the Grant Specialist and Grant Accountant to assess the institutional and project risk score. If the results of the assessment are indicating not favorable or high risk, special terms and conditions may be added to the sub-award agreement and closer monitoring of activity and spending may be required. If the risk level is deemed too great, a sub-award may be refused by the AVP for Research or others in the proposal routing path.

The risk assessment will be reviewed annually within the month or the month following the execution of the initial agreement. The annual review will be initiated by the Grant Specialist and carried out with the assistance of the Grant Accountant and other relevant parties.

Initiating a Sub-award

The Grant Accountant works together with the PI and the sub-recipient to draft the sub-award agreement. Sub-award agreements should include a detailed scope of work and a budget that specifies salary, fringe, supplies, and other direct costs, cost share, if applicable, as well as appropriate F&A costs consistent with the Sub-recipient's indirect cost rate. Terms and conditions from a prime award are typically imposed on the Sub-recipient to the same degree as imposed on TSU as the prime recipient. The sub-award agreement should also include: period of performance, account number (if available), terms and conditions, consideration and payment, deliverable requirements and due dates, sub-recipient signed letter of support, and institutional contact information.

Upon completion of the draft agreement, the Grant Accountant will task the PI and Subrecipient Contract Specialist with review and approval of the draft before submitting for TSU execution. The sub-recipient account number identified at set up should be included on the form when requesting TSU's grant account number. The sub-recipient account is added as a support account under the grant account number assigned.

The sub-recipient will provide a copy of compliance approvals, if applicable, to the Grant Specialist. The compliance approvals for the sub-recipient will be stored in the Maestro project.

Sub-award FFATA Reporting

The Federal Funding Accountability and Transparency Act of 2006 requires the Office of Management and Budget to maintain a single, searchable website that provides the public with information about how tax dollars are spent and gives them the ability to hold the Federal Government accountable for each spending decision. That site is: https://www.usaspending.gov.

Prime Federal grant awardees are required to report information related to a sub-award by the end of the month following the month the sub-award or obligation was made. We are required to report for subawards of \$30,000 or greater. FFATA reporting is completed on the website: http://www.fsrs.gov Data for reporting comprises:

- Federal Award Identifier Number (FAIN)
- Federal Agency ID
- Federal Agency Name
- Prime Awardee DUNS # (TSU is 073161697)
- Prime Awardee Name/ Address
- CFDA Program Number
- Project Description
- Federal Funding Amount
- Obligation/Action Date
- Report Month
- Sub-awardee DUNS #
- Sub-awardee Name/Address
- Sub-awardee Parent DUNS #
- Amount of Sub-award
- Sub-award Obligation/Action Date
- CFDA Program Number(s)
- Federal Agency ID
- Federal Agency Name
- Sub-award Project Description
- Sub-awardee Principal Place of Performance
- Sub-award Number

The Grant Accountant will file the official FFATA report within the time allotted and store a copy of the report within Maestro for audit retrieval if needed.

Sub-award Modifications

During the period of performance of the sub-award, the PI or sub-recipient may request to initiate amendments to the agreement due to time extensions, budget revisions, or other administrative items. When this occurs, the PI tasks the Grant Accountant with starting an amendment to the sub-recipient agreement. The review process and execution will be repeated for amendments.

Sub-award Monitoring

The Grant Accountant monitors the submission of sub-recipient invoices and routes documentation through TexanBuy for PI and Department Head review and approval of expenditures on a project before payment is made to sub-recipient.

Sub-award Deliverables

Sub-recipient deliverables are the responsibility of the PI to collect from cooperator for sponsor progress reports and final technical reporting submitted to the Sponsor. The PI is responsible for ensuring that the sub-awardee is current on deliverables prior to approving payment of invoices to sub-awardee. All documentation should be uploaded to Maestro's "Deliverables" tab to store as the official record.

3.5 Project Set-up in Maestro and FAMIS

Once a fully executed agreement is received from the sponsor and a new grant account number has been issued, the project is ready to be set up in Maestro and linked to the FAMIS account information.

Maestro Project Set-up

To set up the project in Maestro, the Grant Accountant locates the proposal number for the award and opens the project search screen in Maestro. To build the project from the proposal, the Grant Accountant clicks on the Action drop-down box and selects "Create from Proposal." He or she selects or types the proposal number and clicks "OK." Maestro assigns the project an ID number that begins with M. Note that some of the project fields auto populate from information entered on the proposal. The following fields on the General Info screen are completed or reviewed before moving through the rest of the tabs on the left side of the screen to populate:

- Project Admin Organization
- Instrument Type
- Function
- Sponsor Name

- Sponsor Award Number
- FAIN Number (Federal)
- CFDA Number
- Title
- Performance Start and End Date
- Funding Type
- Cost Sharing Required
- Sub Recipient Exists
- Project Status
- Administrator
- Closeout Set-up

The Grant Accountant completes all screens listed on the left hand side of screen, leaving the Billing Project screen for last. This screen is used to enter the new grant account number and link to FAMIS.

For each active sponsored project, the Grant Specialist will review the Maestro setup for overall accuracy as compared to the executed agreement. The Grant Specialist will notify the Grant Accountant of any discrepancies between the Maestro setup and the executed agreement, and the Grant Accountant will make any necessary changes to the Maestro project. The Grant Specialist will upload the completed documentation of the review to the Maestro project.

FAMIS Project Set-up

Once project set-up is complete in Maestro and the grant account is linked to FAMIS, screen 9 is the next step to completing project set-up. The Grant Accountant considers the following fields for entry, depending on project requirements:

- Sponsored Project Enters grant account number with remaining field filled with zeros. After selection, hit ENTER, screen 9 links FAMIS to Maestro and pulls Sponsor and Award Number and auto populates fields
- Start and End Date
- Billing Revenue Object / Indirect Expense Object / Indirect Revenue Object object codes used for reporting funding type
- TE Certify Selects Y if Time and Effort is required by Sponsor
- E-Verify Selects Y if Sponsor requires E-Verify background checks on grant participants.
- Indirect Cost Base, Rate and Distribution if IDC is to be calculated

Sponsored Projects screens or SPR are completed for invoicing.

- Screen 116 Project Billing Information screen selects invoicing options
- Screen 118 Project Bill to Address screen provides additional fields for contact information for Sponsor

For detailed, step-by- step instructions, the Grant Accountant refers to the FAMIS USERS Manual for FRS and SPR on the TAMUS – FAMIS webpage.

https://it.tamus.edu/famis/documents/famis-documentation/usermanuals/

3.6 Budget Set-up

After the project set-up is complete in Maestro and FAMIS, the Grant Accountant loads the budget into FAMIS. The budget approved on the contract or agreement is loaded onto a Budget Revision Electronic Document Template per budget pool. A snippet of the budget is pasted to the template for documentation. FAMIS screen 804 lists the budget pools and corresponding object codes within each pool. This completed electronic template is emailed to budgets@tarleton.edu for FAMIS entry.

Section 4: Managing the Award – Non-Financial

4.1 Conducting the Sponsored Project

The PI leads the implementation of the work outlined in the sponsored project agreement scope of work, in collaboration with personnel on the project. The PI is responsible for overall oversight of the project, including but not limited to ensuring the sponsor's funds are spent in the ways outlined in the agreement and are in compliance with university, state, federal, and other applicable policies and regulations.

4.2 Hiring Personnel

The PI should work with the appropriate departmental and/or college personnel to hire personnel, if outlined in the project agreement. Any restrictions on hiring by the sponsor must be followed.

4.3 Purchasing

The PI should work with the appropriate departmental and/or college personnel to purchase supplies, if outlined and budgeted in the project agreement. Any restrictions on purchasing by the sponsor must be followed.

4.4 Initiating Material Transfer Agreements

<u>Equipment</u> - Management of equipment funded or furnished by sponsors is subject to the requirements of the sponsor or terms of the agreement under which funds for equipment are acquired. All equipment acquired in connection with sponsored agreements will be managed in accordance with System Regulation <u>21.01.09</u>, <u>Fixed Asset Management</u>.

4.5 Project Changes

When changes to the project are required, the PI should contact the Grant Specialist for assistance. The PI and Grant Specialist will work together to outline the change request to meet sponsor's requirements as well as all applicable university, federal, state, and other relevant regulations. The Grant Specialist will then submit to the sponsor for consideration, if needed.

4.6 Submitting Technical Reports and Other Deliverables to Sponsor

Often, sponsors require regular deliverables in the form of technical reports or other. These deliverables will be noted in the agreement and included in the Maestro system by the Grant Accountant. The PI is responsible for the timely preparation of the all deliverables required by the sponsor. Once complete, the PI should forward the deliverables to the Grant Specialist for submission to the sponsor and upload into Maestro. All deliverables must be submitted to the sponsor and uploaded into Maestro so that the institution has a complete record of submission.

Section 5: Managing the Award - Financial

5.1 Verification of Expenditures to be Allowable, Reasonable, and Allocated within the Project Budget

The PI is responsible for managing the budget and expending it in accordance with the sponsor and state regulations on allowable, allocable, and reasonable expenses related to the project, as indicated in the approved budget. The PI must be familiar with and comply with both the

sponsor's guidelines and the University's guidelines for fiscal management of sponsored projects. The Grant Specialist and Grant Accountant may be of assistance in this as well.

General guidelines for expending sponsored program funds are as follows:

- Costs should be necessary and reasonable for the performance of the award and be allocable thereto under these principles
- Be determined in accordance with generally accepted accounting principles (GAAP)
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or prior period
- Costs are adequately documented

In short, expenses can only be recorded on sponsored projects if they are:

- Reasonable, reflecting conscientious and prudent financial decision making
- Allocable and bearing a direct relationship to the activities of the program, not to the general needs of the department or university
- Consistently treated expenses for similar purposes under like circumstances and not exceeding normal limits of similar charges that are not grant supported
- The expenses must be allowable or not specifically excluded as specified by government regulations or by the contract, grant or cooperative agreement requirements

If an expense cannot meet the above criteria, it is not eligible for inclusion in the project budget regardless of its purpose.

Review and approval paths are in place for salary, fringe, travel, pro-card charges and the procurement systems that process the charges to the sponsored projects. The routing paths are set by account number and are reviewed by the PI, Department Head, Dean, Procurement, Grant Accountant and either Payroll or Accounts Payable staff. If a cost is unallowable, the charges can be returned/rejected to the initiator by anyone in the routing path.

5.2 Sponsored Project Administration Oversight

The PI is responsible for the oversight of the sponsored project administration and personnel on the project unless other arrangements have been recorded. Should a personnel change be needed, the PI would make the change with the support of the department or college support staff. Also, the PI and support staff are responsible for monitoring that the payroll for personnel is correctly changed.

5.3 Initiating Personnel Changes

The responsibility for hiring and changes to personnel on a project falls on the PI and the support staff at the department level. Review of monthly payroll reports to monitor costs and

budgets also is dependent upon the departmental support staff and Budget Specialists to ensure payroll is charged correctly to the project.

5.4 Cost-Sharing

Cost sharing is the portion of the total project costs of a sponsored agreement that is incurred by the recipient instead of the sponsor. Cost sharing represents a reallocation of recipient resources to support an externally sponsored project. Terms used to describe cost sharing include:

- Matching Contributions
- Third Party Contributions
- In-Kind Contributions

Cost sharing can consist of direct, indirect and/or unrecovered indirect expenses. When direct expenses are used for cost sharing, the associated indirect expenses are included as part of the cost sharing. Allowable forms of cost sharing are generally outlined by the sponsor, but generally include:

- Effort of the PI and/or employees committed to sponsored agreements, including the associated fringe benefit costs
- Cost of equipment purchases when the purchase is necessary for and dedicated to the completion of the project
- Laboratory supplies specific to the project not general laboratory supplies
- Trave
- Costs proposed and incurred by subcontractors or other third parties, including inkind contributions. In-kind contributions must be verified by the provider. When
 these contributions are in the form of volunteer services, the individual must certify
 that the amount is comparable to their regular rate of compensation. When
 contributions are other than personal services, the provider must certify to the fair
 market value of the items
- Waived or reduced indirect cost. This is known as unrecovered IDC. Unrecovered IDC is applicable when the indirect rate allowed per the agreement is less than the recipient's negotiated rate. (See section 2.6 F&A or Indirect Cost Rates for details on waiving F&A or IDC)

When the set-up of a new award is completed in Maestro and FAMIS, the PI, Department Head and Budget Specialist or Department Administrator are notified and receive and each receives a copy of the fully executed agreement, budget and sponsored project report (SPR), which provides details of the project. Because it is the role of the Budget Specialist or Department Administrator, with direction from the PI, to ensure payroll costing allocations are done to place participants onto the project, it is necessary for the individuals to review the budget for cost sharing required on the project and ensure the share is captured at the rate budgeted throughout the life of the project.

Capturing cost share is the responsibility of the Departmental Support Staff, and is accomplished by coding salary or other obligated expenditures to support accounts set up under the main funding account, using the last five digits of the corresponding grant account.

The Grant Accountant reports the cost share while performing the scheduled financial reporting specific to the Sponsors scheduled reporting deadlines. The format for reporting cost share depends on the requirements of the Sponsor, who, in most cases provides a form for reporting or online format with fillable data boxes.

5.5 Restricted Budget Categories

Tarleton uses budget flags in FAMIS to control budget overspending or spending in unapproved budget categories. Depending on the agreement, it is decided during the account set up stage if the award has budget restrictions. There are three mechanisms for controlling how funds are spent within FAMIS:

- Category Control Flag: allows flags to be set to restrict funds at the budget category
 or expense code level. On screen 10D, placing an "R," "Restricted" flag on a specific
 budget line item will prevent that budget category from incurring expenditures
 greater than the amount budgeted.
- 2. Category Protection Flag: Placing the "P" or "Protection" flag on a budget category keeps those funds from being used to cover overspending in other categories.
- 3. Sub code edits are another means of controlling expenses on an account. Sub code edits differ from the "R" and "P" flags in that they allow actual expense codes to be blocked on the project, in order to exclude unallowable expenses.

5.6 Cost Transfers and Approvals

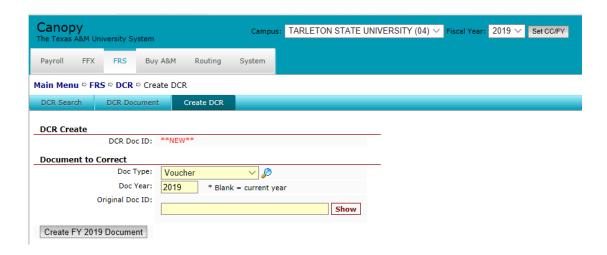
A cost transfer is the reassignment of an expenditure to a sponsored project after the expense was initially charged to another university account, or vice versa. Examples of cost transfers include payroll paid from the wrong account, employee's salary that was not removed from the grant in a timely manner, expenses coded to the wrong account, or disallowed costs rejected by the sponsor.

Cost transfers may only be performed during the fiscal year in which the expense was originally incurred and only within the project term.

Departmental Correction Requests

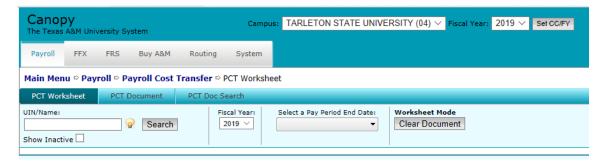
Departmental Administrators and Budget and Records Specialists have permissions in Canopy to perform cost transfers for vouchers from the FRS drop down menu using the following steps:

- Select "Create DCR," which stands for departmental correction request. Select a document type from drop down menu: transaction or voucher.
- Doc Year defaults to current fiscal year. Note: Only select prior fiscal year if still open.
- Original Doc ID: Select original document from list.
- Click "Create FY XXXX Document."



Payroll Cost Transfers

Departmental Administrators and Budget and Records Specialists have permissions in Canopy to perform payroll cost transfers from the Payroll drop down menu by selecting "Payroll Cost Transfer" and choosing how you would like to search and select payroll transaction to transfer.



Any expenditure moved from one account to another 90 days after the original cost transaction will be subject to increased review and may only be approved under extenuating circumstances.

Once the DCR or PCT is submitted, Canopy routes the transfer for review and approval by PI, Department Head, Dean, Grant Accountant, Accounts Payable Specialist or Payroll Specialist, and Accounting Manager.

When routing is complete, the transfer will post to FAMIS in the overnight job post.

5.7 Sub-recipient Invoice Processing

Sub-recipients collaborating with and for Tarleton on sponsored projects should include the following when invoicing Tarleton:

- Sub-recipient shall submit invoices not more often than what is allowed in the sub-award agreement.
- Invoice shall include only allowable expenditures entered into a cumulative cover sheet
 which shows project approved budget, current month's expenditures per budget
 category, cumulative totals per budget line item, and remaining budget per budget line
 item and total available balance for project.
- Reference the sub-award project number assigned by Tarleton that ties to sub-award account number in FAMIS.
- Each expenditure should include supporting documentation, such as payroll reports, invoices or receipts and travel reports with receipts.

Sub-recipient invoices are emailed to the Grant Accountant who reviews invoices to ensure all the above are in compliance before entering into TexanBuy for payment. The invoice is charged to the sub-award account number for proper accounting methods.

TexanBuy routing includes the PI, Department Head, Dean, Grant Accountant, Accounts Payable Manager, and Accounts Payable Specialist.

5.8 Preparation and Submission of Invoices to Sponsor

Invoicing to Sponsors occurs monthly or quarterly based on the contract or agreement payment schedule, which is set up in FAMIS SPR module on screens 116 & 118. The Grant Accountant is responsible for set up of the sponsor invoicing.

FAMIS automatically generates invoices at month end based on the current billing period direct expenditures and IDC calculation, if applicable. FAMIS month end job F04S2540 – Billing Statements and job F04S254R – Create Reimbursable Invoices generates the printable invoices that are found on the Laserfiche Reports repository TAMUS-FAMIS-ECM directory. Current month jobs are located and saved as PDF files for printing and emailing to TIAER and CAE.

Once invoices are printed for the Tarleton-managed grants, the Grant Accountant pulls documentation required to accompany invoices before scanning, saving to the grant file, and submitting to the sponsor. Required documentation includes: payroll reports from Canopy, copies of invoices, travel reports with receipts, pro-card charges and receipts, sub-award invoices, contractor invoices, and, specific financial report or cover sheet to accompany invoice, if required by the sponsor.

The completed invoice with required documentation is scanned and saved to the grant file and Maestro, then emailed to the sponsor for remittance, review and payment. Some sponsors use online websites for invoice remittance and draw down of funds.

5.9 Draw Downs

Most federal and some state agencies use online websites for uploading invoices and drawing reimbursable funds that are remitted by ACH or wire. Several sponsors and their online systems are listed below.

USDA-NIFA – ASAP
Welch Grant – proposalCENTRAL
USDA-APHIS – ezFedGrants
DOJ – grants.ojp.usdoj.gov
OOG – eGrants System
DOE – G5
USFWS – IPP
TWC – TWC

Depending on the website, financial report information is entered with a total draw amount, and invoice is uploaded, if required before submitting. Email notification is sent for confirmation, and in most cases ACH is received within a day or two. The Grant Accountant is responsible for all draw downs and financial reporting completed on websites listed.

5.10 Invoice Payments and Collection

Payments are received by check, ACH payment receipt, or bank wire.

Cash Payment Receipts

Checks are received in the daily mail by the Business Services Administrator each morning and provided to the Business Services cashiers. The cashiers review the remittance information provided by the payee to determine what the payment is for. If the check references an invoice that begins with "R" or notes a grant number that starts with a 4, the check(s) are given to the

Grant Accountant, after they are logged and signed out. The Grant Accountant prints FAMIS screen 635 – Invoice Display, and attaches to the check and returns to the cashier to post payment in FAMIS. Screen 635 provides customer number and billing total, which should match the check amount.

ACH and Bank Wire Payments

Business Services receives the daily ACH and bank wire payment reports each morning. Using the information in the ACH report, such as sponsors name, payment total, account reference and invoice number identifiers, the Banking Accountant applies the payments to the customer accounts or invoice numbers in FAMIS. If the payment is a different amount than the invoice submitted to sponsor, the Banking Accountant notifies the Grant Accountant of the discrepancy for further review.

5.11 Outstanding Invoices and Account Reconciliation

On the last day of each month, a Business Objects report is set to run that pulls open invoices. This report is used for the Receivables Monthly Reconciliation Report. This report is used to clean up any variances or identify any problem areas, such as short or over-payments. This reconciliation also ages the open invoices by current, 31-60 days, 61-180 days, 181 days – 1 Year, and Over 1 Year.

The Grant Accountant reviews the open invoices and sends collection emails to Sponsors, notifying them of the past due invoice(s). Collection attempt notes are added to the report that is completed by the 10th of each month. The Accounting Manager reviews the Accounts Receivable monthly Recon Report and may take further action on collections before sending reconciliation to the AVP of Finance and Administration.

5.12 Financial Reporting

The financial report process is a project level reporting, performed quarterly, bi-annually or annually determined by sponsor requirements, that reports all expenditures by budget category for the period and/or life to date. The financial report calculations are completed by the Grant Accountant on the sponsors' website, or uploaded with the invoice into the draw module. Some sponsors require the PI to perform the financial reporting instead of the Grant Accountant. When this is the protocol, the Grant Accountant provides the numbers to the PI to enter into the sponsor's website to ensure financial accuracy.

It is important that financial reporting is completed before the due date since the reimbursement of expenditures will be placed on hold until an approved financial or deliverable report is received by the performing agency. Maestro is utilized to set up email reminders to the PI, Co-PI, PA, and Grant Accountant when all deliverable types, such as progress, project

outcome, technical and financial reports are due. Reminders can be set to email at 90, 60, and 30 days before due. Late reminders are set at the same intervals, with an email sent to the Department Head and dean at 60 and 90 days past due.

All financial reporting is reviewed and approved by the Grant Accountant before submission to the sponsor.

5.13 Sponsor Approved Administrative Changes

The following administrative changes require sponsor approval:

- Project roles and responsibility changes
- Change in scope of work
- Interim funding requests
- Budget revision, no-cost extension and carry-forward
- Continuation or Supplemental

Project Roles and Responsibility Change Requests

A change to the PI or Co-PI(s) requires a memorandum from the existing PI on departmental letterhead. The memorandum states the effective date of the change in PI or Co-PI(s) and signed by all parties.

Once the memorandum has been approved and signed, the Grant Accountant submits to the sponsor for approval.

When the sponsor approval is received, the Grant Accountant makes the necessary changes in responsibility on the Grant account in FAMIS, updates Grant files in Maestro and uploads the approval documentation for backup.

Change in Scope of Work

A change in the scope of work requires sponsor approval. The PI makes contact with the Sponsor PA to request information about processes needed to request scope of work change. Usually, a change in the scope of work does not require an amendment to the contract or agreement. Approval documentation should always be uploaded to Maestro by PI or Grant Accountant for backup.

Interim Funding Request

Interim funding is the authorization from the sponsor to expend funds on a project to a specified limit, prior to receipt or execution of the award documents.

The interim funding request is completed by the PI and is sent to the Sponsor PA and Grant Accountant is copied. The request should include the start and end dates of the interim

funding request, which should fall within the period of performance defined by the sponsor. The total expenditures needed, listed by budget categories on existing project budget, with a backup account for funding in case the contract or agreement is not signed and project does not proceed to awarded, and signatures from the Department Head and Dean who are responsible for the backup account.

Budget Revision, No-cost Extension and Carry-forward

A budget revision, no-cost extension, or carry-forward is a sponsor-approved administrative change, which allows funds to be expended past the original project end date and extends the date that final programmatic and financial reports are due. For these budget changes and extensions, the PI is required to work with the Departmental Administrator, Budget Specialist, and Grant Accountant to revise the budget for submission to the sponsor. The responsibility of submission to the sponsor can vary depending on the sponsor's online system or the sponsor's PA. In any case, the Grant Accountant and Department Head must approve budget revisions or extensions before submission to the sponsor. The Grant Accountant must also be copied or notified if the request is approved by the sponsor so that FAMIS and Maestro can be updated.

FAMIS and Maestro dates and budgets are updated accordingly by the Grant Accountant with approval documentation uploaded to Maestro for backup.

A copy of the approved budget revision is emailed to the Departmental Administration and Budget Specialist for payroll costing allocation adjustments.

Continuation or Supplemental Funding Request

Continuation or supplemental requests usually involve additional funds requests to add to an existing award outside of the original proposal that does not require a competitively reviewed application.

A budget is provided to the sponsor for the additional funding, which is composed by the PI and Departmental Administrator and Budget Specialist and approved by the Department Head, Dean and Grant Accountant. A contract or agreement amendment is supplied by the Sponsor with the new or revised budget which reflects the existing funding with additional funding added in a separate column. Once the amendment is fully executed, the Grant Accountant updates the dates and budget in FAMIS and Maestro and uploads the executed amendment to Maestro for backup. A copy of the amendment is emailed to departmental support staff and Budget Specialist for payroll costing allocation adjustments.

5.14 Indirect Costs (IDC)

Indirect costs are those costs that are incurred for common or joint objectives and cannot be easily and specifically identified with a particular sponsored project. These costs are also called "facilities and administrative costs "(F&A)" or "overhead." The terms indirect costs (IDC),

overhead costs, and F&A costs are synonymous. University indirect costs include building and equipment depreciation and use allowance, general administration, and operation and maintenance expenses; thus, indirect costs are the related costs of using the University's facilities and administrative support that cannot be claimed as direct costs.

Indirect Cost Allocation

Indirect costs are recovered by charging the sponsor based on a percentage of the total or modified direct costs expended on the project during the billing cycle. This is accomplished by a month end FAMIS Systems IDC job FO4RR200 – Indirect Cost Calculation, which runs and charges the grant account IDC. This total IDC expense is then allocated with a budget transfer into indirect cost accounts set up for the PI, Department Head, Dean, VP of Academic Affairs, VP of Finance and Administration, and student research based on percentages outlined in Tarleton's Standard Administrative Procedure 21.01.03.T0.01 Indirect Cost Allocation. This budget transfer is completed during the FAMIS month-end close based on Maestro distribution tables.

The funds shall be expended in compliance with <u>Texas Education Code</u>, <u>145.001 – Grants and</u> Research Expenses.

Section 6: Time and Effort Reporting

6.1 Time and Effort Overview

Time and Effort reporting is a process mandated by the federal government to verify that direct labor charges (salaries and wages) to federally sponsored projects are reasonable and reflect actual work performed. As a recipient of federal funds, Tarleton is subject to financial accounting and reporting obligations designed to ensure that the charges to its federally sponsored projects are allowable and effort can be tracked and recorded accurately to reflect the work performed.

In compliance with federal requirements, the TAMUS Regulation <u>15.01.04 Time and Effort</u> <u>Reporting</u> applies effort reporting to all federally-sponsored projects, including federal flow-through projects. Many non-federal sponsors also incorporate the requirements of A-21 in agreements. Therefore, a System member may determine that effort reporting will be performed for other types of sponsored projects (i.e., State of Texas sponsors, local, private, or foreign), not just federally-sponsored projects.

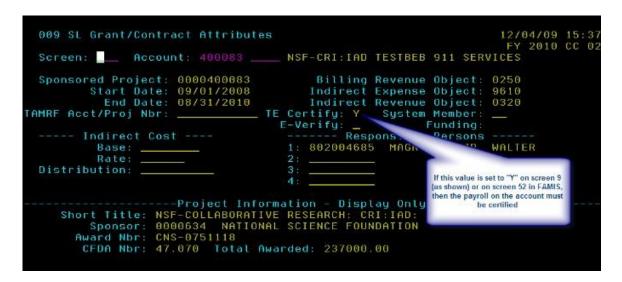
The system practice is to utilize an after-fact effort reporting system to certify that salaries charged, or cost shared, to sponsored agreements are reasonable and accurately reflected the work performed.

Payroll distribution is the allocation of an individual's salary to an account(s) based on budget estimates (estimates determined before the services are performed). Effort reporting certifies 100% of an individual's actual time or effort (including cost sharing and/or matching) after the services are performed.

Effort reports are required for individuals whose salary or any portion of their salary is charged directly or cost-share including matching funds to a federal, federal flow-through, or other sponsored agreement that requires effort reporting. This is a mandatory federal requirement. Non-federal sponsors may require effort reporting on other sponsored agreements. Once it is determined effort reporting is required for all sponsored agreements, all effort reporting will be verified in the same manner for consistency.

Additionally, all accounts and/or support accounts that are created to track cost-sharing on federal, federal flow-through and State of Texas projects should be marked as well.

To accomplish this, the Grant Accountant follows the steps below: If an account requires certification, the account **MUST BE MARKED** on screen 9 or on screen 52 in FAMIS. This is done by keying a "Y" in the T&E Certify field as shown in the image below.



If this field is left blank, FAMIS will automatically set the Flag to "Y" if any of the following conditions are true.

- The FAMIS account is linked to a Maestro project that has a federal sponsor
- The FAMIS account is linked to a Maestro project that has a federal flow-through sponsor
- The FAMIS account is linked to a Maestro project that has a State of Texas sponsor
- The FAMIS account is a cost-sharing account

Note: The above rules are in place to assist with the marking of accounts that require certification. Setting the field to "N" will override the rules listed above.

6.2 Time and Effort Responsibilities

A PI or designated individual supervising employees working on a sponsored project must certify the effort reported. Employees may be required to assist in the certification process by confirming that the allocation of 100% of time worked for the period is accurate. The Administrative verification concept can be added to a department's verification options. Adding a time-keeper, administrator, or Budget and Records Specialist to a department's verification option allows a preview step prior to certification by the PI or manager. To add this feature, email the Time & Effort Point of Contact at Tarleton.

PIs are granted self-certification status, which simply means that the employee, as the PI on the project, can review and certify his or her own effort report.

Training is required every three years for employees who self-certify or confirm documents, manage employees who do, and/or hold administrative roles in the T&E system. TrainTraq course no. 2111113, Time and Effort, is automatically assigned to users based on job profiles in Workday.

The Time and Effort System is located on the Single Sign On menu. Detailed guides, frequently asked questions, video tutorials and system help for the Time and Effort processes can be found at http://it.tamus.edu/timeandeffort/

6.3 Time and Effort Certification

Time and Effort currently has a reporting period set for two certification periods per year:

- 1. January 1 through June 30
- 2. July 1 through December 31

The activation dates of Time and Effort will occur 15 days after the last certification period date, so those dates are July 15 and January 15 respectively.

Once the reports are made available for review, notification emails are sent January 15th and July 15th to Pl's, managers, and administrators to notify them that they have items in their inbox that require action in the Time and Effort System. Deadline for completing certification is 45 days from the email notification.

Section 7: Closing the Award

7.1 Maestro Notification of Project End Date

The first step in the project closeout is for the PI to make a decision if the project can be completed by the end date. Maestro emails the PI a decision letter 90 days before the project end date and requests a yes or no answer to verify and approve closeout. An action is also listed in the PI Maestro dashboard under action needed with a closeout decision listed. If the answer is no, a modification request is required by the PI. See section 5.20 Sponsor Approved Administrative Changes. If yes, the Grant Specialist and Grant Accountant are notified of the closeout pending and a project closeout task is added to the "To Do List" on the Maestro home page Dashboard.

For more information about the Maestro closeout decision screens and a video for instructions, individuals may access by clicking on Maestro Home, select "About Maestro", choose "User Documentation" from the left side selections, and click on "Administrative Dashboard User Manual."

7.2 Process Final Expenditures & Remove Staff Payroll from Grant Account

As the project nears the end date, there are key items for the PI, departmental support staff and Grant Accountant to address to ensure accurate and timely closeouts. Project closeout finalizes all project activities across all phases of the project, including:

- Check outstanding encumbrances to ensure all invoices have been charged against the
 project and purchase orders have no back orders that need followed up on or cancelled,
 and liquidate encumbrances and purchase orders cleared.
- Ensure all travel and pro-card charges have been processed within the timeframe of the grant period of performance.
- Review payroll encumbrances and bi-weekly staff to ensure entry and routing is completed for final weeks of project. Perform costing allocations to remove staff from payroll and perform cost transfers for any payroll overages. Once payroll is re-allocated, any payroll encumbrances should be liquidated from grant account.
- Ensure all expenditures are accurately recorded for the life of the grant account.
- Review any budget overages to ensure expenditures are within the allowed overage limit per sponsor agreement, which is commonly 10% or less of total the award.
 Agreement and contracts can be located in Maestro under the documents section or contact Grant Accountant for assistance.
- Research and correct any other discrepancies.

7.3 Submitting Final Technical Reports to Sponsor/Upload to Maestro

Once the PI and Co-PI completes and submit the required final technical reports to the sponsor, the PI is responsible for uploading the deliverables to Maestro and changing the status to completed. If the PI needs assistance, they can reach out to the Grant Specialist.

7.4 Submitting Final Financial Reports to Sponsor

The Grant Accountant is responsible for preparing the final financial report and submitting to the sponsoring agency. In some cases, sponsor reporting modules require the PI as the responsible person to perform this task. If this is the case, contact the Grant Accountant for final financial reporting totals. See *5.18 Financial Reporting* for additional information.

7.5 Reconcile and Deactivate Account in FAMIS & Maestro

When all expenditures and payroll are processed and posted to FAMIS, the Grant Accountant freezes the account to stop additional charges from posting to the closing grant account. The next steps are completed to close the grant in Maestro:

- Confirm all expenditures are processed,
- Confirm no charges posted after the end date,
- Confirm any account deficits are transferred off grant account,
- If sub-awards are involved, ensure final invoices are received and processed,
- Verify all encumbrances have been liquidated and removed from account,
- Verify expenses equal revenues,
- Conduct IDC audit to verify percentage and total amount equals budge,
- If cost share is involved, ensure requirements are met,
- Verify final deliverables have been sent to sponsor and uploaded into Maestro,
- Verify sponsor has been final billed and all revenue received,
- Verify final IDC expense has posted, and
- Set Maestro billing project status to "terminated."

Steps to complete in FAMIS are:

- Clear remaining budget totals from SL screen 34,
- Clear SPR billing instructions on screen 116, and
- Instruct the Senior Accountant to freeze and close account in screen 6, 8 and 44.

For step-by-step Maestro closeout instructions, go to the "About Maestro" tab from the "HOME" screen, and under "User Documentation" select "Project Closeout Manual."

7.6 File Closeout Documentation

Tarleton uses Maestro as the repository for the sponsored project official records. These records include, but are not limited to, proposals, project budgets, agreements or contracts, invoices, draws, project modifications, deliverables, financial reporting, and closeout documentation.

7.7 Record Retention

Record retention refers to the time period that a document is kept or "retained" whether in electronic or paper format. It is important to remember that a retention for sponsored projects may vary depending on the specific federal, state or private funding agency. Retention periods are specified in most sponsor agreements. If the grant agreement does not specify retention period, the Texas A&M University System Regulation 61.99.01, Retention of State Records and Tarleton Standard Administrative Procedure 61.99.01.T0.01 Records Management is used for retention procedure. The Grant Accountant is responsible for the post-award documentation storage and record retention monitoring.

Section 8: Sponsored Projects Administration Roles and Responsibilities Matrix

8.1 Sponsored Projects Administration Roles and Responsibilities Matrix

The Sponsored Projects Administration Roles and Responsibilities Matrix summarizes roles and responsibility for externally-funded projects and is located at: https://www.tarleton.edu/ori/documents/sparr-matrix.pdf

Legend:

O = Owner

C = Contributor

8.2 Annual Process Performance Review

Annually, between February 1 and April 1, the Grant Specialist will randomly select 10% of projects that were active within the current fiscal year. The Grant Accountant, Grant Specialist, Associate Dean for Research, and any other relevant parties will review the selected projects to ensure the documented procedures for project administration, financial administration, and compliance were followed as detailed in this Sponsored Projects Administration Procedures Manual.

Specifically, the project review will focus on the following areas to ensure processes were accurate and/or in compliance with requirements:

Set up of Sponsored Project and Related Cost Share

- Billings
- Expenditures
- Sub-recipient monitoring
- Reporting
- Close-out
- Time and effort reporting
- Related protocols for human subject, animal research, and/or biosafety

The review will be documented on the Sponsored Project Annual Process Performance Review Results spreadsheet, including analysis of the results and related action plans for improvement, if needed. Action plans will be implemented by the individuals assigned in the spreadsheet. The review documentation for each fiscal year will be retained on the Office of Research and Innovation shared drive following the institutional records retention policy.

Section 9: Resources

9.1 Links

- System Regulation 15.01.01 Sponsored Agreement Research and Other
- Tarleton <u>SAP No. 15.01.01.T0.01 Preparation</u>, <u>Review and Submission of Sponsored</u>
 Projects
- Tarleton <u>SAP No. 15.01.01.T0.02 Residual Balances from Fixed Price Sponsored</u>
 Documents
- Tarleton Rule No. 15.01.03.T1 Financial Conflicts of Interest in Sponsored Research
- Tarleton Rule No. 15.02.99.T1 Export Controls
- TAMUS Regulation <u>15.01.04 Time and Effort Reporting</u>
- Tarleton Rule No. 15.99.01.T1 Use of Human Subjects in Research
- Tarleton Rule No. 15.99.03.T1 Ethics in Research and Scholarship
- Tarleton Rule No. 15.99.06.T1 Use of Biohazards in Research, Teaching and Testing
- Tarleton Rule No. 15.99.07.T1 Use of Vertebrate Animals
- Texas A&M University System Regulation <u>61.99.01</u>, <u>Retention of State Records</u>
- Tarleton Standard Administrative Procedure 61.99.01.T0.01 Records Management
- Tarleton SAP No. 21.01.03.T0.01 Indirect Cost Allocation
- System Policy 25.07 Contract Administration
- Time and Effort processes http://it.tamus.edu/timeandeffort/
- Texas Education Code, 145.001 Grants and Research Expenses.
- FAMIS User Manuals: https://it.tamus.edu/famis/documents/famis-documentation/usermanuals/
- FFATA reporting is completed on the website: http://www.fsrs.gov
- OMB Circular A-21, Cost Principles for Educational Institution 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

- Sponsored Projects Roles and Responsibilities Matrix_ https://www.tarleton.edu/ori/documents/sparr-matrix-2019.pdf
- Maestro Security Role Access Update Request Form_ https://www.tarleton.edu/osp/documents/maestro-access-form.pdf