Roles and Responsibilities

Office for Sponsored Programs (OSP):

- Each month, the departmental administrator should run the 'segments' report in crew Date parameters should be for anticipated end dates to be 'next 120 days.'

- OSP will prepare a draft FSR based on the latest PER figures during the last 30 days of the 90-day reporting period and send it (via fax or email) to departments for review and approval (generally 2 weeks before submission date). A memo will be sent along with the draft FSR to the department for further clarification on issues regarding costs compliance, cost overrun, or underspent situation.

- OSP will not report expenses that have not posted to the G/L at the time of FSR preparation, except under exceptional circumstances (to be determined and approved by OSP on a case by case basis).

- If OSP does not hear back from the department within 5 business days, OSP will notify department or tub level financial officer before submitting the report. However, the report will not be held beyond the FSR submission deadline if a reasonable effort has been made by OSP. Only under extenuating circumstances, will OSP approve the request to postpone FSR submission.

Department:

- Monthly generation and review of "Awards Ending in 4 Months or Less" report. Take timely action for requesting no-cost extensions if they are needed.

- Ensure all outstanding charges are processed in the G/L and complete the account reconciliation process within the first 60 days of the 90-day reporting period.
• Account reconciliation process should include ensuring that all expenditures on the account are allocable, reasonable, consistent and incurred within the reporting budget period. Journals or cost transfers should be prepared immediately to remove any disallowed costs from the federal awards.

• For training grants, preparing the FSR involves reconciling stipend and tuition payments for each trainee. Departments should send all trainees' appointment forms (2271 forms) to OSP no later than 60 days prior to the FSR submission date (these forms should be completed before any expenses are incurred for the trainee and sent to OSP at that time).

• Upon receiving the draft FSR from OSP, the department has 5 business days to review and approve the FSR and respond to OSP with any pending issues.

• Under extenuating circumstances, if the department needs more time for account reconciliation, the request to postpone FSR submission should be first reviewed and confirmed by the tub level manager and then approved by OSP.

Policies and Procedures

Federal Awards:

1. FSR Reporting
Annual FSRs are submitted to the agencies within 90 days of the end of each budget year for federal awards that require annual reporting, e.g. NIH grants that are excluded from SNAP (Streamlined Non-Competing Award Process). Most Federal awards require a Final FSR at the end of award period and the final FSR must be submitted to the agencies within 90 days of the project/award end date. Late FSRs can mean severe penalties for the university, such as loss of Expanded Authorities. The FSR preparation process requires the department to complete account reconciliation and ensure all appropriate charges are posted to the G/L within the first 60 days of the 90-day reporting period. During the last 30 days, OSP will work with the department to complete FSR preparation and submission.

In some cases departments will prepare Financial Status Report/Invoice or provide OSP with additional supporting documents because of the level of detail required by the sponsor (i.e. costs breakdown by task, or salary breakdown by individual effort % etc.) These Financial Status Reports/Invoices must be submitted to OSP in order to obtain institutional approval.

• Some agencies may require the reporting of Cost Share. The actual non-sponsored cost share dollars and account number must be documented by the department and forwarded to OSP for inclusion in FSR and record retention.
Some federal awards (grants or contracts) have more frequent reporting requirements such as quarterly FSR-269 as well as quarterly/monthly reports (e.g. FS272, FS270 or FS1034) this is determined by the award terms and conditions. Ongoing interim reports (if less than annually) will be submitted by OSP without departmental approval.

2. Reviews and Non-reportable

Annual Review

- For federal awards that do not require annual reporting, e.g. NIH non-competing years if under SNAP, OSP conducts an annual review of expenditures by completing an internal FSR-269 form and worksheet. OSP will alert the department if there are cost compliance issues, e.g. questionable transactions, variances on restricted budget categories or large unexpended balances (> 25% of current year budget).

- Departments should respond to OSP within 5 business days and take any necessary action such as processing journals, cost transfers or budget reallocations.

Final Review

- For non-reportable federal awards (e.g. NIH Fellowships), the department should reconcile the accounts and provide final closing figures to OSP within 90 days of the end of the award period. Timely reconciliation of these accounts will reduce the risk of late and possibly unallowable cost transfers and will also enable OSP to reconcile federal letters of credit in a timely manner.

Non-reportable

- Although no individual financial reports are submitted to the NSF, OSP must reconcile the expenditures to the budget at the award termination. OSP must also submit a collective quarterly report to the NSF on all open grants via the cash management letter of credit mechanism.

- A reminder email will be sent by OSP to the department requesting account final closing figures within 45 days after the award ending date.

- Departments should reconcile NSF accounts and provide final closing figures to OSP within 90 days of the award end date to ensure OSP can submit accurate and appropriate expenditures to NSF in a timely manner.

- OSP also conducts annual review for NSF awards. Departments should respond to OSP's concerns regarding questionable transactions within 5 business days and take actions immediately by processing journals, cost transfers, or budget reallocations.

3. Invoices (Contracts and Subcontracts)
• Most federal contracts and subcontracts require submitting invoices for cost reimbursement. Most interim invoices/reports (monthly, quarterly, semi-annually) are submitted by OSP without departmental approval; however OSP will contact the department with any questions or concerns.

• In some cases departments will prepare the invoices/reports or provide OSP with additional supporting documents because of the level of detail required by the sponsor (i.e. costs breakdown by task, or salary breakdown by individual effort % etc...) These invoices/reports must be submitted to OSP in order to obtain institutional approval.

• At the end of each budget period, OSP will send the invoice/report to the department for review and approval if there is a restriction on the fund balance to be carried forward.

• Submission deadline for most final invoices is within 45 - 60 days after the contract or subcontract end date. (to facilitate submission within 90 days to Prime sponsor, eg. NIH). Sponsor may NOT honor reimbursement on invoices submitted after 45-60 days.

• Final invoice is prepared by OSP based on latest PER and sent to department for review and approval. Turn around time for approval is 5 business days.

• If OSP does not hear back from the department within 10 business days, the account will be forwarded to the tub level manager for further action. If appropriate action is not taken within 5 days, OSP will submit the invoice for expenses posted to the G/L. The department will be responsible for absorbing any costs not reimbursed due to failure to notify OSP of expenses incurred in time for inclusion in final invoice.

**Non-Federal Awards:**

• Most interim invoices/reports (monthly, quarterly or semi-annually) will be submitted by OSP without departmental approval.

• Interim reports that require departmental action (budget variance resolution, expenses detail breakdown, carryforward restriction, P.I. signature, etc) will be sent to the department for review and approval.

• All final reports/invoices (including annual report) will go to the departments for review and approval. The approval process includes ensuring that all costs incurred within the award/budget period and the expenses are appropriate according to the terms and condition of the awards.

• Turn around time for departmental approval is 5 business days. For non-federal awards that have specific deadlines for submitting the final invoices/reports for cost reimbursement, if OSP does not hear back from the department within 10 business days, the tub financial manager will be
notified for further action. In this case, the department is responsible for absorbing any costs if
sponsor declines to pay the late invoice.

- In some cases departments will prepare the invoices/reports or provide OSP with additional
  supporting documents because of the level of detail required by the sponsor (i.e. costs breakdown
  by task, or salary breakdown by individual effort % etc...) These invoices/reports must be
  submitted to OSP in order to obtain institutional approval.

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**Revision History**

7/25/13 – Added to OSP website in PDF format