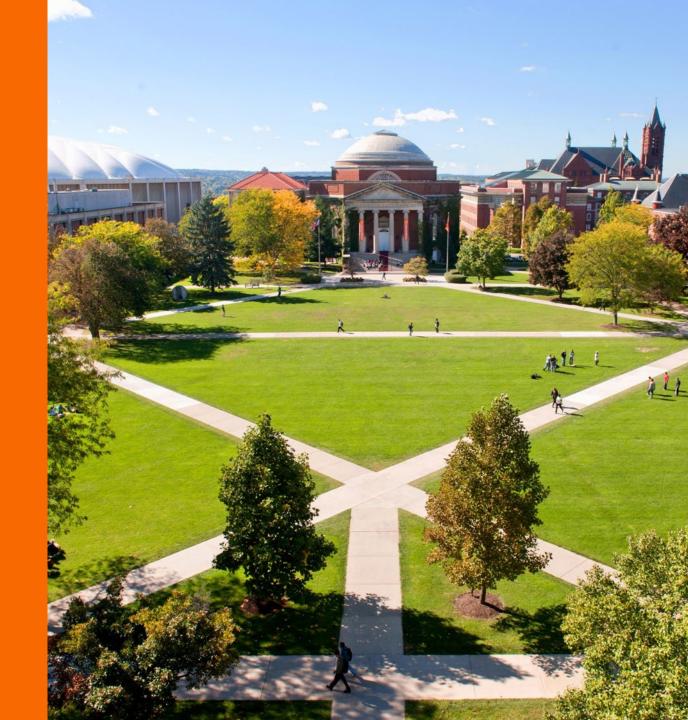


## What Can OSA Do For You? - Financial Best Practices

Office of Sponsored Accounting (OSA)

**Cathy Hayduke**, Director, Sponsored Accounting **Toni Besaw**, Assistant Director, Sponsored Accounting

Office of Research Awareness | December 1, 2021

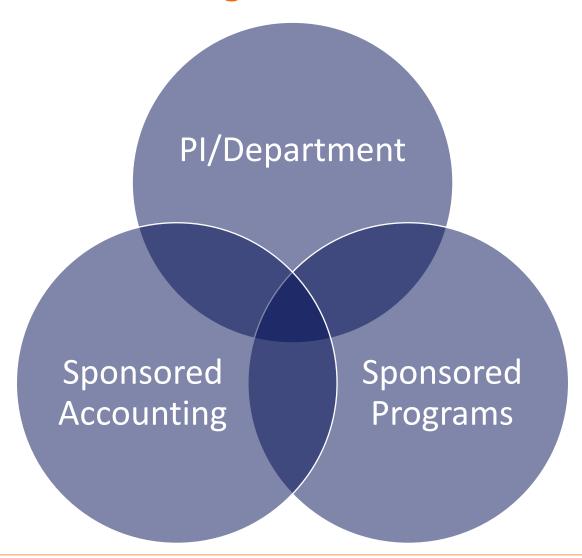


## What Can the Office of Sponsored Accounting (OSA) Do For You?

#### **OSA Mission Statement:**

Supporting funded research and other scholarly activity by providing comprehensive guidance and service to the campus community, while ensuring responsible stewardship of sponsored funds.

## The Sponsored Research Triangle



## OSA's Role – Recap of May 2021 Session

### OSA's Role at Syracuse University:

- Unit of Business, Finance and Administrative Services.
  - Report to the Comptroller's Office
- Central Unit designated to officially submit financial information invoices, financial reports, property reports on behalf of Syracuse University.
- Effort Certification Process.
- Program Income.
- Cost Sharing.
- Coordinate and Respond to various Sponsored Audits.

## OSA's Responsibilities – Recap of May 2021 Session

### **OSA's Responsibilities:**

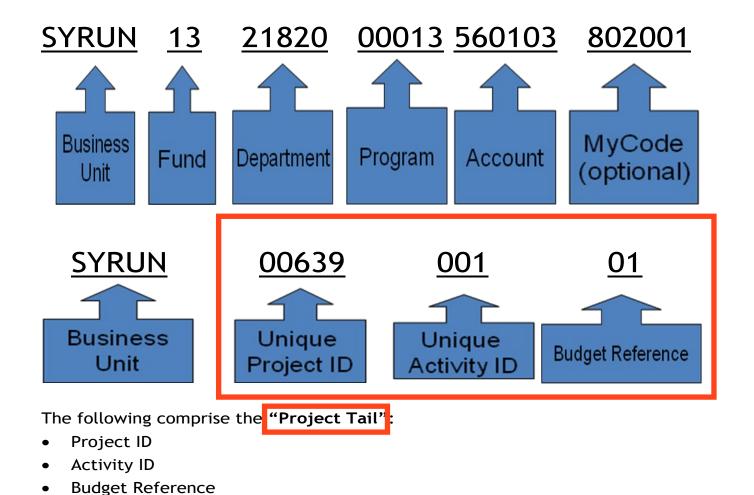
- Facilitate responsible use and accountability of sponsor's funds in collaboration with the Principal Investigator, department administrators, and Sponsored Programs.
- Assure compliance with University policies and Sponsor guidelines.
- Submission of financial information invoices, financial reports, property reports to the Sponsor as outlined in the agreement.
- Effort Certification.
- Coordinate and Respond to various Sponsored Audits.
- Provide Training.

## Types of Funding

### **Types of funding:**

- Unrestricted
- Restricted
- Sponsored
  - —Sponsored chart strings contain a "project tail" and are established at the time of award set up by the Office of Sponsored Accounting

## Syracuse University Sponsored Chart String Structure



## Interpreting the Award Setup Paperwork – Recap of May 2021 Session

### Congratulations, you've received an award, Now what?

- Review the award terms and conditions
- Review the 'Sponsored Regs' prepared by Office of Sponsored Programs (OSP)
- Record progress reporting due dates
- Review the budget and budget narratives to plan out expenditures
- PI/Budget Managers work to update appointments for project personnel
- Review any institutional cost share requirements for expenditure with 'project tail'
- Review for third party collaborators (subawards or consultants), work with OSP to setup agreements

## RAAC - Recap of May 2021 Session

### Managing Expenditures in accordance with federal Uniform Guidance

**Reasonable** - Necessary for performance of the project, passes the prudent person test, in accordance with University Policies

Allowable - Permitted costs per the award terms and conditions and University Policies

**Allocable** - Costs can be specifically assigned to a singular project, provides benefit to the project

**Consistently Treated** – Expenses that are alike are treated in the same manner under like circumstances

## To assure compliance with University policies and Sponsor guidelines

### **Sponsored Award Order of Precedence**



### Sponsored Award Order of Precedence

#### 1. Award Terms and Conditions

Each sponsored award has its own set of terms and conditions that is unique to that award

### 2. Program Specific Guidelines

Each sponsored award has its own set of program specific guidelines that is unique to that award

### 3. Agency Specific Guidelines

Each sponsored award has its own set of agency specific guidelines that is unique to that award

#### 4. OMB Uniform Guidance – 2 CFR 200

The federal government's guidance on administrative requirements, cost principals and audit requirements for federal awards

Became effective 12/26/13 and superseded A-21, A-110 and A-133

## Order of Precedence, Institutional Policies & Procedures and Public Law

### **Example of Order of Precedence**

- 4. Federal Award from Health and Human Services (HHS)
- 3. HHS award from National Institutes of Health (NIH)
- 2. NIH award from National Eye Institute (NEI)
- 1. NEI award specific terms and conditions

Along with the Order of Precedence, institutional policies & procedures and public laws must also be considered.

### Additional guidance can be found in the Post Award Manual

https://bfas.syr.edu/comptroller/resources/sponsored-accounting/

# Sponsored Services – When Is Forward Funding Appropriate? - Recap of May 2021 Session

### **Use the Forward Funding mechanism when:**

- 1. High likelihood of award
- 2. All regulatory requirements are satisfied (IRR, IRB, FCOI, etc.)
- 3. Allowable project startup costs are necessary and for continuations

### How to request from OSP?

- 1. Complete the Forward Funding Request form
- 2. Authorized by PI, Department, and Unit Leadership
- 3. Requests greater than \$99k require CFO and Provost approvals

### Why should I utilize Forward Funding?

1. Best Practices - costs should be allocated to the appropriate chart string when incurred

## When is Sponsor Prior Approval Required? - Recap of May 2021 Session

### Common items that require prior sponsor approval:

- Change in Project Scope
- Change in PI or key personnel
- Significant Re-budgeting (check sponsors award for specific parameters)
- Reductions in key personnel effort (25% or PI absence for 3 months or more)
- Foreign travel for some sponsors (check sponsors award for specific requirement)
- Re-budgeting 'Participant Support Costs' to other categories
- When ordinarily 'Unallowable Costs' are proposed for expenditure

## Effort Certification Process - Recap of May 2021 Session

### **Definition of Effort Reporting:**

Effort is defined as the amount of time spent on a particular activity. It includes the time spent working on a sponsored project in which salary is directly charged or contributed (cost-share). Effort reporting is the mandated method of certifying to the granting agencies that the effort charged or cost shared to each award has actually been completed.

## Effort Reporting- Recap of May 2021 Session

### Requirements and Parties Involved:

- Uniform Guidance sets forth criteria for acceptable methods of charging salaries and wages
  to federally sponsored projects. It requires a payroll system that directly charges salaries to
  appropriate projects.
- Uniform Guidance also requires that the University develop a mechanism to determine or confirm how individuals actually expend effort during a specified time period. These effort reports must be performed on a regular schedule and must be certified by individuals who have first-hand knowledge of 100% of the employee's compensated activities. In most cases, that would be the employee or the direct supervisor of that employee.

## SAMtool - Recap of May 2021 Session

### SAMtool – Sponsored Award Management Tool:

- Rolled out in Fall 2015
- Purpose
  - To provide a tool for financial and budget management of sponsored awards
- Access
  - For Principal Investigators access is automatically granted upon award set up in the PeopleSoft System
  - All other access is attained via a FAST request submitted by your departmental Information Coordinator. All access is based on your role and security access.
- On-going Enhancements

### Features of the SAMtool - Recap of May 2021 Session

### The specific features of the SAMtool are:

- "dashboard" type reporting for chairs, deans and VPR, providing a summary of department, school/college, and University-level sponsored activities by primary investigators (PIs), total sponsored budget, etc.
- at-a-glance summary views for PIs and administrators on awards for which they are responsible
- burn-rate indicators for potential over- or underspending on awards
- ability to drill down from summary data to multiple sublevels of summary data, and to the transaction level while also providing links to source documentation
- ability to categorize financial data to mirror OSP budget template categories, providing intuitive analysis throughout the award lifecycle
- enabling of PIs and administrators to create "what-if" scenarios for project planning, including commitments throughout the grant cycle
- provision of a clean, consistent and concise reporting tool for all sponsored awards
- reduction/elimination of the need for shadow systems

## Types of Preaudit Handled by OSA

### **Preaudit**

- ePro purchases and Purchase Requisitions
  - Equipment
  - Fabricated Equipment
- Travel and Expense Vouchers
- Consultants
- Tuition
- Stipends
- Payroll
  - RAPs
  - PARs
  - ERS
  - Chart String Changes

## Types of Preaudit Handled by OSA - continued

### **Preaudit**

- Leases
- Advances for Human Participants and Field Research
- NRAs
- IDs
- Journal Entries and Cost Transfers
- Procards
- Cost Share
- What is considered timely submission? 90-day standard

## Preaudit Red Flags – Auditor's Guide

- <u>Purchases</u> made within the last 90 days of award MUST include business purpose, delivery date and how it benefits the award
- <u>Spending patterns</u> no spend, slow spend, excessive spending near end of award, large purchases near end of award, deviations from budget, change in scope, signs of possible mis-spending (Physical Plant)
- <u>Compensation</u> Avoid spikes in salary spending, document budget deviations (especially past period distribution adjustments), sponsor approval for Administrative salaries, Extra Service Pay and Overtime
- <u>Pre- and Post-award expenses</u> checking dates of purchase/service/delivery, expenditures in last 90 days are suspect, especially equipment and material. Expenditures for items, activities, or services after the total or budget period are unallowable

## Preaudit Red Flags – Auditor's Guide - continued

- <u>Cost Transfers</u> Timely, documented & allowable cost, questionable after 90 days or in last 3 months of award "spending down" award, moving costs from different awards, inadequate justification, adjustment of previously certified payroll (effort)
- <u>Travel Cost</u> Patterns/Outliers frequency of traveler/location, justifications late/no authorization, unbudgeted/excessive cost, expenses paid by other sources, travel during end of award period
- <u>P-Card Documentation</u> Need for purchase, benefit to the project, date of purchase/delivery, location of delivery, reasonable price, frequency of the purchase, NO personal items
- <u>High Risk Vendors</u> PayPal and other internet only vendors, Amazon (Institutional accounts less risky than personal accounts), Electronic Equipment companies (i.e. BestBuy/NewEgg/Tiger Direct),
  - Subject to FAR/debarment

### **Preaudit - Best Practices**

- <u>Account Codes</u> i.e. equipment vs. supply when expenditures are not coded properly, the F&A planning is affected
- <u>Leases</u> make sure OSA is included in the process for lease submission when involving sponsored awards
- <u>Advances</u> advances for travel for field research on a sponsored award and human participants in a research protocol, sponsored and non-sponsored cannot be done through the online travel and expense module at this time
- **Equipment/Fabricated Equipment** all major equipment is defined as having an expected useful life of more than one year and a value greater than or equal to \$5k (unit price). Freight can be included in the fabricated equipment cost at time of purchase if it is for shipping necessary components of the item being purchased. Items must be necessary for the equipment to operate <a href="https://bfas.syr.edu/comptroller/resources/property-and-equipment/">https://bfas.syr.edu/comptroller/resources/property-and-equipment/</a>
- <u>Backup</u> detailed receipts needed, GL detail should be attached for cost transfers, sales tax, time period, end dates

## Financial Reporting & Invoicing

- OSA is the only office designated to officially submit financial information invoices, financial reports, property reports on behalf of Syracuse University.
- OSA works with the PI and/or department administrator to ensure accuracy and timely submission to the sponsor

### **Audits**

- OSA is the officially designated office to lead an external financial audit on behalf of Syracuse University.
- OSA works with OSP, the PI and/or department administrator.
- OSA provides documents, responses, etc. to the auditor/sponsoring agency
- PI/Department administrator is responsible for notifying OSA when they receive an external notice of audit

### Sponsored Services – Training Resources

- Pre-requisite
  - All other BFAS training relevant to the position responsibilities
- On-going
  - One on One based on security access and sponsored award types
  - Sponsored Services Coffee Break Sessions
  - Office of Research Awareness Sessions
  - Sponsored webinars
- Please visit our training websites at:
  - <a href="https://bfas.syr.edu/comptroller/resources/sponsored-accounting/sponsored-accounting-training/">https://bfas.syr.edu/comptroller/resources/sponsored-accounting/sponsored-accounting-training/</a>
  - <a href="https://research.syr.edu/proposal-support-services/trainings-and-presentations/">https://research.syr.edu/proposal-support-services/trainings-and-presentations/</a>

## Sponsored Accounting and Grad School – What's New

### \*Announcing a New Workflow for Campus\*

Sponsored Tuition Remission Form for Graduate Research Assistantship

OSA <u>DOES NOT</u> need to receive/review forms with the following:

- 1. No project tail
- 2. Contains project tail but with ZERO credit hours
- 3. School/college/department pays for the tuition on a non-sponsored chart string with no project tail
- 4. School/college/department pays student wages from salary holding chart string funding source not determined yet

## Sponsored Accounting and Grad School – What's New - continued

\*Announcing a New Workflow for Campus\* - continued

Sponsored Tuition Remission Form for Graduate Research Assistantship

OSA <u>DOES</u> need to receive/review forms with the following:

- 1. Chart string contains project tail
- 2. Contains project tail and >0 credit hours
- 3. Award or cost share with project tail pays for the tuition
- 4. School/college/department pays student wages from salary holding chart string funding source will be sponsored

## Your Sponsored Accounting Team for Financial Award Support

Please consult the OSA website for the OSA Representative who supports your School, College, Department, or Center.

Cathy Hayduke, Director

Toni Besaw, Assistant Director

Liz Bull, Senior Accountant

Kelly O'Connor, Senior Accountant

TBD, Senior Accountant

Kelly Moshier, Senior Accountant

TBD, Accounting Analyst, Effort Certification

Lori Mangano, Accounting Analyst, Award Set-ups

Evan Diederich, Office Coordinator III

**Effort Reporting** 

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### Additional Resource Links

https://policies.syr.edu/policies/administrative-and-financial/

http://comptroller.syr.edu/

http://comptroller.syr.edu/resources/sponsored-accounting/

http://research.syr.edu/

http://sponsoredprograms.syr.edu/

http://researchintegrity.syr.edu/

https://www.grants.gov/learn-grants/grant-policies/omb-uniform-guidance-2014.html



Questions, Comments, Suggestions?

