POST-AWARD FISCAL ADMINISTRATION

In the post-award phase of your project for questions related to budget forms, account numbers, transfers, payroll, etc. -- The Office of Sponsored Programs (OSP) and Department of Restricted Funds Accounting will be your chief contacts.

After an award has been made, changes affecting items such as the budget or the award period are sometimes necessary. While there is some consistency in federal agency regulations regarding post-award changes, each agency does have its own rules. Awards from non-federal sponsors are also governed by rules specific to each sponsor. Therefore, should a post-award change be required, the Project Director (PD) or Principal Investigator (PI) may refer to the sponsor regulations or contact the OSP (6811/6819) with specific questions affecting the change.

When the OSP receives an award document from a sponsor, the document is sent to the principal investigator or program director with a letter. In the case of a federal or state contract (including sub-contracts and awards) are received, it is reviewed by the OSP Contract Specialist and forwarded to the President (ARO), or his designee, for signature. The PI/PD should examine: statement of work, budget (indirect costs, matching, release time), reporting requirements, rebudgeting restrictions, required sponsor prior approvals, patent and copyright terms, if applicable, submission dates for continuation or renewal proposals and other provisions. Any required amendments to grants and contracts are reviewed by OSP with the PI/PD and forwarded to the President (ARO), or his designee, for signature. Objections or questions should be communicated to the Associate Vice President for Research and Sponsored Programs (6811) or Associate Director (6819) of Sponsored Programs for discussion and negotiation with the sponsor.

A post-award conference with a member of the OSP staff will be needed to make certain PIs/PDs are aware of and agree to carry out their responsibilities to Delaware State University and to the Sponsor while participating in sponsored activities.

Awards from the funding agency to the University must receive prior review of all terms and conditions by the OSP, regardless of the type of sponsor. The OSP is responsible for negotiating appropriate remedies if an award fits into any of the following categories: 1) it contains provisions that are incompatible with the University’s policies on sponsored activities; 2) it is inconsistent with government-wide
regulations for universities; 3) it fails to include all the elements agreed upon prior to an award; or 4) it requires modification to conform to a PI's needs. The OSP must also have on file the signed Internal Processing (IPF) Form and a copy of the Request for Announcement (RFA) or a Request for a Proposal (RFP). Three offices should have copies of the Notice of Grant Award. They are as follows:

Principal Investigator/Program Director
Office of Sponsored Programs
Restricted Funds Accounting

**Post-Award Conference at DSU**

The PI or PD must schedule a post-award conference with the OSP Compliance Officer/Specialist (6812) within five days after the award has been granted. The purpose of the post-award conference is to make the PI or PD aware of the following:

- a. Review budget and submit same to the Department of Restricted Funds Accounting;
- b. Process assurances/certifications, if necessary;
- c. Review 'Time and Effort' process;
- d. Discuss technical and fiscal reporting requirements;
- e. Discuss personnel hiring procedures, if applicable;
- f. If it is a continuation award, discuss approval of any carry over of unobligated funds;
- g. Requisition supplies and/or equipment;
- h. Monitor and report expenses;
- j. Discuss any Institutional Review Board (IRB) and Institutional Animal Care and Use Committee (IACUC) requirements

*Additionally, the Director of Restricted Funds Accounting, Office of Business and Finance, requires that all PDs/PIs have a project close-out meeting with the Department of Restricted Funds Accounting 60 days prior to the ending of the award.*
Purchases

It is the responsibility of the principal investigator to ensure that purchases are allowable within the grant guidelines and OMB Circular A-21. **All invoices must be sent to Accounts Payable by the vendor.** If, by chance, original invoices are received by the Principal Investigator or Program Director, they must be hand-delivered to accounts payable... Each invoice must be signed by the requestor (person who requested the goods).

The Department of Restricted Funds Accounting functions relating to sponsored projects include:

- Assignment of project department numbers after awards have been granted and the assignment of a budget analyst who will work with the OSP and the PI/PD during the project period.

- When a firm commitment is received (with or without a check), send a copy of the commitment to the Office of Sponsored Programs and the Department of Restricted Funds Accounting to ensure compliance.

- **Requisitions and Purchase Orders:** Delaware State University requires that a requisition (see in Appendices I & II) describing the goods and/or services desired be prepared in advance of every purchase and entered into the University Banner System. An authorized individual must sign the requisition which must identify the department by number, name, and the account classification of the purchase by object code. A listing of department and object code numbers are available by contacting the Purchasing Office. Please call the Purchasing Office at Ext. 6270 with any questions regarding coding of requisitions.

- After a requisition is prepared, approved and competitive prices have been obtained (if required as described below); the Purchasing Office will issue a Purchase Order number to the vendor. **Departments must not place orders directly with vendors. A requisition number is not a valid purchase order.**
The President has appointed a computer advisory committee to review purchasing of computer equipment. **The purchases must be consistent with standards set forth by the University.** Please call the Help Desk for assistance (ext. 7028).

The Purchasing Office is available to render assistance to you in fulfilling your needs by obtaining the lowest possible price for each purchase made by the University.

The Department of Restricted Funds Accounting will review all invoices charged to a grant to determine allowability of costs within funding guidelines, as well as to verify that sufficient funds are available and that the budget per line item is maintained.

The Assistant Vice President for Research and Sponsored Programs, Dr. John Austin, or the Associate Director of Sponsored Programs, Ms. Renee Jones, reviews requisitions in accordance with cost allowability principles found in OMB Circular A-21. Items which are not allowable include, but are not limited to: entertainment, alcoholic beverages, promotional items, advertising, club dues, and legal fees. **The Project Director/Principal Investigator is responsible for being familiar with information on OMB Circular A-21;** however, questions concerning allowability should be directed to the Director or Associate Director of Sponsored Programs.

**No expenditure payment will be approved prior to notification of the award by the agency or program.** Grant account numbers are not set up until the project is approved for funding and the award notification is received by the Department of Restricted Funds Accounting.

**Purchasing Procedures:** No bidding or solicitation of competitive prices is required at any level of purchase for goods, services, and equipment purchased from a vendor awarded a **statewide contract.** You are encouraged to contact the Purchasing Office (6270) for information on available statewide contracts.

The policy for purchasing equipment at Delaware State University is as follow: (1) if the cost of equipment is more than $1,000, one quote in writing is needed; (2) if the cost of equipment is **more than $5,000.**
three quotes in writing are needed. A **minimum of 45 days is required for requisitioning equipment if the cost is more than $10,000 as a formal bid in newspapers is required, and again a minimum of 45 days is requested.** Therefore, no requisitions for equipment will be accepted less than 45 days before the project period ends.

**Note:** The Purchasing Office has the right to change vendors, but not items. This may be necessary due to competitive pricing or delivery.

**Bidding Procedures:** Purchases of $10,000.00 or more require public advertising and receipt of sealed bids. This procedure takes approximately four (4) weeks after receipt of an approved requisition. **THIS PROCEDURE SHALL BE PERFORMED BY THE PURCHASING OFFICE.** The Purchasing Office reserves the right to withhold payment to the vendor until all proper bidding documentation is received. All purchasing documentation for equipment over $10,000 will be filed in the Purchasing Office.

**Rebudgeting** is a transfer of funds between account lines. Sponsoring agencies have specific requirements for rebudgeting approval. In general, there are two types of rebudgeting that require approval: (1) transfer of funds to a category that otherwise requires approval (e.g. travel or equipment), and (2) transfers that would change the character of the project. Transfers that do not affect the character of the project do not require prior approval. For example, rebudgeting $1,000 from materials and supplies to computer services does not require prior approval. Project directors should consult the Office of Sponsored Programs or Department of Restricted Funds Accounting with questions regarding rebudgeting.

Except for the amount of salaries, as pre-approved by the funding agency, rebudgeting (changes in line item budget) will be approved internally by the Office of Sponsored Programs and the Department of Restricted Funds Accounting. Requests for salary adjustments exceeding the authorized level in the award document must be approved by the appropriate grants management representative from the funding agency, and the appropriate University program officer/manager, Chair and Dean.

The Associate Vice President for Research and Sponsored Programs, Dr. John Austin and/or Budget Analyst, must sign all budget
transfer forms for sponsored projects (see attached sample of the Budget Transfer Form (See Appendix III). Guidelines and regulations in accordance with allowability principles found in OMB Circular A-21 (See Appendix VII) will be followed.

Cash Management
The Department of Restricted Funds Accounting is responsible for cash management. In most cases, it includes a draw-down process for receiving funds from the funding agency. The Department of Restricted Funds Accounting has the procedures for drawing down funds for the appropriate grant awards.

Property Management
The Department of Restricted Funds Accounting performs an annual inventory of equipment costing over $1,000 which is purchased on restricted funds. All equipment purchased by grant funds are labeled with DSU identification tags by the Central Receiving Office staff. Location and condition of the equipment are also identified. The principal investigator is held responsible for the location as well as the maintenance of equipment. An inventory report will be reviewed at the end of the grant period.

Travel
Delaware State University has contracted with a responsible and qualified vendor to provide small purchase credit cards for related expenses. The card is known as the PNC Travel Card. It is issued in the employee's name, to be used only for official university travel. Applications for the PNC Travel Card and copies of the travel policy are available in the Office of Business and Finance. (A copy of the Travel Policy is in the Pre Award – Appendix C)

The Travel Authorization Form (See Appendix IV) must be approved for budget availability before one may travel. The Travel Request/Authorization Form must include the following: the traveler's name, date of authorization, ID number, department number to be charged, date of
departure and return, purpose of the trip and number of staff and/or students traveling (if applicable), an estimate of all travel expenses, the appropriate signature of the traveler(s), immediate supervisor, department chair and/or appropriate dean. After the Travel Request/Authorization Form have been signed by the traveler, immediate supervisor, and audited by the appropriate division Budget Analyst, the traveler or budget analyst enters the data into Banner.

**Important Note** - The travel request has to be approved in Banner before the PI/PD is authorized to travel.

Per Diem (Meals)

Per diem for meals and associated tips will be available up to $45.00 per day - $7.00 for breakfast, $11.00 for lunch, and $27.00 for dinner. Receipts will not be required unless meals exceed those amounts. However, meals must be reported on the PE-1 Form at the per diem amount (or greater) in order to be reimbursed. The PE-1 Form and a properly signed travel request/authorization form should be taken or forwarded to the Travel Analyst where it will be dated and time stamped.

Tolls, Tips, Parking, Etc.

All receipts are required except for tips. All expenditures must be set forth on a Personal Expense Reimbursement Form (PE-1) at the conclusion of your trip.

Travel Reimbursements

All requests for travel expense reimbursements must be submitted on the University Personal Expense Reimbursement Form (PE-1) provided by the Travel Desk (see Appendix V). This form should be submitted to the Travel Analyst within 72 hours after the completion of travel.

Reimbursements for travel expenses incurred without required receipts, as outlined, are strictly prohibited. A "no receipt - no reimbursement" policy applies. An affidavit for lost, stolen, etc. receipts is unacceptable.

Personnel assigning or receiving account coding of travel expenses should ensure that Travel account codes (8xxx series) are used in
preparing the Personal Expense Reimbursement Form. A PE-1 Form not completely filled out or having the appropriate signatures will be returned to the traveler. This will cause a delay in reimbursement.

Except for selected group student travel and expenses not chargeable to the Card, the Office of Business and Finance will not issue travel advance checks. You may choose to use the card or your own funds. You will be reimbursed after the trip is completed and the required forms and receipts are submitted.

Student Travel

When student travel occurs, an advance will be made out to the appropriate faculty or staff advisor for the group. It will be the responsibility of the advisor to fill out the PE-1 Form upon returning from the trip and to make sure that university policies are followed concerning reimbursement. All university policies concerning travel advances apply to the Student Government Association and all other student organizations sponsored by the University.

Monthly Budget Reports

If special requests are made to the Director of Restricted Funds Accounting, a budget report which includes the income and expenditure accounts of a grant fund can be sent to the principal investigator. Otherwise, budget reports will be distributed on a monthly basis (normally around the 10th of each month). The principal investigators should compare and reconcile the ledgers with their own records. If the investigator’s records disagree with those of the Department of Restricted Funds Accounting, the principal investigator is obligated to contact the Director of Restricted Funds Accounting to resolve the differences. The release of budget reports on a monthly basis is effective in communicating timely information on the financial status of funds.

Award Close-Out
Close Out Reminder

The Compliance Officer/Specialist will forward a reminder to the PI/PD’s 90 days prior to the end of the project period that their award is due to close.

Award Close-out Meeting

The Compliance Officer/Specialist will schedule an award close out meeting with the PI/PD approximately one month (30 days) prior to the close of the award.

During the meeting, a member of the OSP staff will review the documentation required to close the award in a timely manner (i.e. final technical and fiscal reports, finalizing receipt of all time and effort reporting forms, (if necessary) equipment inventory and any patents, etc.

Agency Reports

Technical reports required by a grant agency are the responsibility of the principal investigator, and should be completed per the funding agency deadline. Financial reports required by a grant agency, including the final close-out report, are the responsibility of the Department of Restricted Funds Accounting in coordination with the principal investigator. Any unobligated balance on a federal grant will be returned to the federal agency, unless the agency has authorized that the remainder will be retained for further use by the principal investigator.

Reminder: The Director of Restricted Funds Accounting, Office of Business and Finance, requires that all PDs/PIs have a project close out meeting with the Department of Restricted Funds Accounting 60 days prior to the ending of the award.

Sub-recipient Contracts

Delaware State University serves as the primary recipient of grant funds. If the proposal requires a sub-recipient arrangement, the principal investigator should contact the Contract Specialist and the Budget Analyst in order to ensure that the agreement includes appropriate federal requirements. Current legislation requires primary
recipients to determine whether sub-recipients have met the applicable federal audit requirements. A contract with a sub-recipient should include at a minimum the following requirements:

- Appropriate audit (i.e. A-133, A-128) submitted to Delaware State University
- Corrective action plan in instances of noncompliance with Federal laws and regulations submitted to DSU
- Access to financial records for independent auditors

**Important:** Please note that Sub awards and Contracts have specific forms that need to be completed. Please see the Contract Section of the PI Handbook on Sub awards and Contracts. Any questions, please contact the OSP Contract Specialist.

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**Subcontracts and Subgrants**

While subcontracts and subgrants are generally anticipated during the proposal stage and included in the proposal itself, some sponsors require that specific written approval be obtained before the subcontract is executed. Any subcontract that was not included in the proposal, requires the sponsor's approval before it can be executed on behalf of the University and the work commenced. In accordance with government regulations, the project director will need to document the reasons for the choice of that particular subcontractor. (See the PI Handbook Section on Contracts). **Note** that all subcontract/subgrants fall under and must apply to the same terms and conditions as the prime recipient. The flow-down process applies to all subcontracts/subgrants.

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**Hiring New Personnel (Staff)**

Delaware State University is an equal opportunity employer. All educational and employment activities are administered without discrimination because of race, color, religion, national origin, age, or sex (except where exempt) in accordance with all local, state, national laws,
executive orders, regulations and guidelines.

If new persons are to be hired to work on the grant project, the principal investigator must contact the Human Resources Office. **A person cannot start work unless the Provost’s signature is on a Contract, Personnel Action or Letter of Appointment.**

To process a request for Personnel Action, please contact the Human Resources Office. This process must be completed and approved before any action is taken to fill a vacancy. The employee cannot be paid until a Social Security Card or an Immigration Form I-9 is completed and is presented. **New employees (STAFF) must report to the Human Resources Office prior to beginning/commencing/starting work. Again, a person cannot start work unless the Provost’s signature is on a Contract, Personnel Action or Letter of Appointment. (See Appendix VI on Visiting Foreign National Students).**

Again, for federal program hiring, all employment procedures as set forth above must be followed and a contract or a letter of appointment must be issued by the President. If the appointment is a supplemental assignment to a regular employee, the duties and time for performance must be clearly described. Federal regulations require an auditable record of time spent for employees in programs sponsored by Federal Agencies. **DEANS, PROGRAM DIRECTORS AND/OR DEPARTMENT HEADS ARE RESPONSIBLE FOR ENSURING THAT NO ONE IS ALLOWED TO WORK FOR THE UNIVERSITY UNTIL ALL REQUIRED PROCEDURES HAVE BEEN CARRIED OUT.** The hiring procedure is available on the DSU Human Resource website.

**Time and Effort Reports**

Time and effort reporting is for the purpose of determining the total amount of effort allotted to a funded project by the key personnel (example: principal investigator, director, and other professional staff). The Office of Sponsored Programs has developed a time and effort reporting system *(See Appendix VII)* whereby the principal investigators who have federal or state funds **must complete a report (each semester for faculty, each month for staff, including any students being paid an hourly salary to work on the project) and list the time committed per grant.** The principal investigators and all other
personnel are required to sign off on the time and effort report. Whenever the percentage of effort changes for a particular project during the semester, the principal investigator should notify the Office of Sponsored Programs. The Office of Sponsored Programs is responsible for retaining sponsored time and effort reports. Time and Effort Reports are now required for student stipends and student scholarships.

**Audit**

The Finance and Administration Office is subject to an annual audit by an independent accounting firm. The examinations are intended to ascertain the effectiveness of the financial management systems and internal procedures that have been established to meet the terms and conditions of the grant agreements. Fiscal integrity of financial transactions is tested, as well as compliance with terms and conditions of federal and other grants. Delaware State University is subject to OMB Circular A-133 single audit *(see Appendix VII)* requirements as a State university. Financial records are also subject to review by Internal Audit. It is important to note that Federal and State agencies can notify the PI/PD of a site review at anytime during the grant period or shortly after the close of the project/program. All required documents need to be organized and filed to be in full compliance.

**Major Changes in the Research Plan**

Any change that constitutes a redirection of the statement of work (and associated budget) included in the original proposal should be discussed and approved in advance with the funding sponsor technical representative. A letter should be sent to the sponsor regarding the proposed change, with a copy to OSP and Restricted Funds Accounting. **No changes should take place until approval (in writing) has been received from the sponsoring agency.**

**Cognizant Agency**

The cognizant federal agency for Delaware State University is the Department of Health and Human Services. The cognizant agency is responsible for negotiating indirect cost rates, ensuring that audits are received and that reports are made in a timely fashion in accordance to
the relevant circular requirements. The cognizant agency provides technical advice, makes quality control reviews of selected audits, coordinates audit reviews and oversees the resolution of audit findings.

**Information Resources**

The Office of Sponsored Programs subscribes to the Federal Grants Management Advisory Service which sends monthly updates of the changes in federal requirements.

**Post-Award Changes and Approvals**

**Carryover of Funding**

Sponsoring agencies and organizations have different rules regarding funds that are unspent at the end of a budget period in a multi-year grant.

NIH requires that unobligated funds at the end of one budget period be returned or subtracted from the next budget period unless carryover has been approved. **A request to carry forward funds should be made prior to the last quarter of the budget period if possible.** A request should be sent through OSP to the sponsor with an explanation of why the residual funds exist and how it will be used during the next budget period.

**No Additional Funds ("No Cost") Extension**

Requests to extend the award termination date without additional funds should be sent to the representative at the funding agency with copies to the Department of Restricted Funds Accounting, and the OSP. Request for a no-cost extension should be accompanied by an explanation of the need for a time extension and brief statement of how the residual funds will be used during the requested period of extension.

**Supplemental Funds**

Request to supplement awarded funds should be treated as a "mini-proposal". A budget showing how the funds will be spent and an explanation of why they are both necessary and relevant to the research
must be included in the request. All supplemental requests must be processed through the Office of Sponsored Programs.

**Change of Principal Investigator**

Requests to change the principal investigator must have the approval of the President or Provost, academic dean, and the sponsor. Reasons for the change, together with a curriculum vitae for the proposed new principal investigator, should accompany the request.

**Absence or Change in Status of the Principal Investigator**

Should a PI or PD not be in a position to continue the research scope, i.e., when the project will continue without active direction of the PI, at the approximate level proposed by the PI during the continuous period in excess of three months, the approval of the sponsor is required. Any question regarding the budget should be discussed in connection with the change.

**Prior Approval Authorities**

For policies and procedures review the following websites:

National Science Foundation (NSF)


National Institutes of Health (NIH)

CONTACT LIST

The following people are available and offer their assistance:

**Office of Sponsored Programs**
Dr. John Austin, Assistant Vice President for Research and Sponsored Programs  Ext. 6811

Ms. Phyllis Perry  Ext. 6810
Senior Secretary

Ms. Renee S. Jones
Associate Director of Sponsored Programs  Ext. 6819

Mr. Dennis Rubino  Ext. 6834
Research Administration

Ms. Michele Hunsiker  Ext. 6832
Contract Specialist

Ms. Earlene R. Jackson  Ext. 6812
Compliance Officer/Specialist

**Purchasing Office**
Michael Conaway, Purchasing Manager  Ext. 6272

Liz Wardrop  Ext. 6270
Purchasing Coordinator

**Restricted Funds Accounting**
Ms. Jeanel Lofland  Ext. 7062
Director of Restricted Funds Accounting

Ms. Ayeda D. Silent  Ext. 6244
Financial Administrator I

Mr. Harold E. Hazzard
APPENDICES