

**GRANTS & SPONSORED PROJECTS ACCOUNTING FINANCIAL POLICY MANUAL**

Office of the Controller

Financial Policy Manual

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# Administration of Sponsored Projects

*To ensure that the funds provided from external sources to support research and other projects are administered in accordance with University policies as well as those of the sponsor. External sources include both federal, private and state organizations.*

Policy

1. All externally sponsored projects for research or other purposes will be administered through the Office of Sponsored Programs, the Title III office or Institutional Advancement in accordance with established University policies and procedures.
2. Any project, which meets any of the following criteria, is considered to be a “sponsored project” and will be administered accordingly:
	1. The project commits the University to a specific line of scholarly or scientific inquiry, typically documented by a statement of work;
	2. A specific commitment is made regarding the level of personnel effort, deliverables, or milestones;
	3. Project activities are budgeted, and the award includes conditions for specific, detailed or formal fiscal reports, and/or invoicing;
	4. The project requires that unexpended funds be returned to the sponsor at the end of the project period;
	5. The agreement provides for the disposition of either tangible property (e.g. equipment, records, technical reports, theses or dissertations) or intangible property (e.g. inventions, copyrights, or rights in data) which may result from the project;
	6. The sponsor identifies a period of performance as a term and condition of the award.
3. All externally sponsored research or teaching activities that involve human subjects, laboratory animals, use of radioactive materials, or biohazardous activities must be reviewed by the appropriate University committees for compliance with University policies and governmental regulations.
4. Questions regarding whether a particular award is a sponsored project should be directed to the Office of Sponsored Programs.

Related Information

Please see Gift Policy

Roles and Responsibilities

The role and responsibility of the Office of the Controller and Grants Accountant is to:

* Appropriately route the project for review and approval

# Approval of Proposals & Grant Submissions

*To ensure that proposals submitted for external support of research and other sponsored projects comply with University financial and other policies.*

Policy

1. All proposal submissions seeking external support for research and other sponsored projects, regardless of mode of submission to the sponsor, must be submitted to the responsible office for review and approval prior to submission to an external sponsor. Preliminary discussions of projects, including research plans, budgets and other terms may occur in advance of approval by the responsible office so long as no binding commitments are made.
2. Prior to approval by the Office of the Controller and Grants Accountant, all proposals and grant submissions must be approved by the Principal Investigator, the Office of Sponsored Programs/Title III/Institutional Advancement, dean and/or Vice President.
3. When a project involves members of more than one school/center, the approval of all responsible deans/VP/directors is required, including responsible parties at sub-awardee institutions.
4. The Grants Accountant attests to the completeness and accuracy of the budgetary and administrative information contained in the application.
5. The University reserves the right to withdraw any proposal that does not comply with this policy.

Related Information

Please see Facilities and Administrative Costs

Roles and Responsibilities

The role and responsibility of the Office of the Controller and Grants Accountant is to:

* Appropriately route the project for review and approval
* Accepts responsibility for the completeness and accuracy of the budget

# Financial Responsibility

*To establish responsibility for the financial administration of the sponsored projects.*

Policy

1. Agreements for sponsored projects are entered into in the name of Lincoln University of the Commonwealth of Pennsylvania by the Office of Sponsored Programs, the Title III office or Institutional Advancement.

2. The principal investigator is directly responsible for the management and administration of the sponsored project within the administrative constraints imposed by the sponsor and in accordance with University policy. In this capacity, the principal investigator authorizes all direct cost expenditures of project funds and is responsible for reviewing and approving all project related expenditures and cost transfers.

3. Changes to project budgets or expenditures which require institutional or sponsor prior approval, must be reviewed and approved by the Office of Sponsored Programs, Title III or Institutional Advancement.

4. The grants accountant will generate and provide monthly statements of project expenditures to the responsible principal investigator. It is the responsibility of the principal investigator to review each monthly statement for accuracy and completeness and to initiate corrections, when appropriate, no later than 90 days from month end.

5. Expenditure corrections including changes to payroll distribution done after the time of effort certification is subject to the 90 day limitation and must be approved by the Controller or by the next higher level as appropriate and by OSP/Title III/IA.

6. The principal investigator or program director, shall advise OSP/IA and the grants accountant as to the desired disposition of a deficit or disallowance in a sponsored project account. In the absence of such advice, the expense representing the direct costs of the over- expenditure or disallowance will be transferred to an appropriate unrestricted account from the fund account to cover the deficit or disallowance.

Roles and Responsibilities

The role and responsibility of the Office of the Controller and Grants Accountant is to:

• Generates and provides monthly financial statements to the responsible PI

• Reviews financial statements with Principal Investigator monthly

• Performs correcting entries no later than 90 days from original month end of original transaction date

• Maintains approvals and documentation supporting expenditures for each sponsored project

• Routes requests for sponsor mandated approvals to OPS/IA for review and approval

• Provides documentation, as necessary to OPS regarding sponsor approvals, etc.

• Communicates with OPS regarding reporting and closeout issues