

## **Grant and Contract Accounting Office Fiscal Responsibilities on Fund 145/146 Grant/Contract Projects**

Restricted grants and contracts are awarded to the University; not to individual investigators or departments. Acceptance of a grant or contract by the University signifies the University's willingness to assume responsibility for the administration of the funds in accordance with the terms specified by the sponsor, the applicable costing policy requirements, and other applicable federal, state and local law and regulations. This responsibility is shared within the institution by the Principal Investigator (PI), his/her Chair and/or Director, his/her Principal Budget Administrator (PBA), the School of Graduate Studies and Research (SGSR) and the Grant and Contract Accounting Office (GCA). All parties involved carry out processes to see that the terms of the award are observed, and that expenditures during a given period are not in excess of funds awarded. The complementary roles are as follows:

### A. Principal Investigator (PI)

1. Develops an over-all plan for the commitment and expenditure of grant and contract funds, working with the authorized person(s) in the department, college and SGSR.
2. Initiates expenditures to be charged against the grant or contract project id/speedkey.
3. Supervises expenditure of sponsored project funds and approves subrecipient invoices to assure:
  - a. That funds are utilized only for purposes directly related to and benefit the activity supported in the award.
  - b. That expenditures are consistent with all special terms, conditions, or limitations that apply to expenditures under the particular grant or contract.
  - c. That expenditures do not exceed the total funds authorized for a given period under the grant or contract. In many cases the grant or contract may also specify expenditure limits by budget category or line item.
4. Assumes accountability for deficits or disallowances that occur under a sponsored award.

### B. Principal Budget Administrator (PBA) – Dean or Director

1. Establish systematic procedures in the college for supervision of grant and contract project ids/speedkeys.
2. Provide reasonable coordinated administrative support for the management of grant or contract project ids/speedkeys. Administrative support will provide detailed monthly report of grant or contract expenditures and encumbrances.
3. Consult with principal investigator concerning the resolution of deficits or disallowances incurred on a grant or contract project id/speedkey and work with the GCA to resolve the problem quickly.

### C. School of Graduate Studies and Research (SGSR)

1. Reviews proposals
2. Accepts sponsored program awards on behalf of the University

3. Communicates with sponsors regarding changes that require official systemic amendments to award criteria (i.e. no-cost extensions).
4. Carries out entity level and project level risk assessment before issuing a subaward.
5. Is the contact office for disputes over contractual terms or performance on sponsored agreements, and will escalate as needed.

D. Grant and Contract Accounting Office (GCA)

1. Creates, manages and closes out restricted Fund 145 and 146 projects in the Financial Management System (FMS).
2. Processes restricted project budgets and budget revisions in FMS.
3. Responsible for managing FMS (the system of record and database) that provides detail and summary financial data for sponsored projects.
4. Reviews, approves and monitors grant/contract transactions daily, weekly and monthly to assure consistency with institutional, state, federal and sponsor policies, as well as other sponsor terms and conditions.
5. Provides guidance regarding the appropriate expenditure of project funds, specifically cost allowability, rebudgeting, budget category flexibility, period of performance and interpretation of regulations as they pertain to specific situations.
6. Monitors subrecipients and reviews subaward invoices to ensure compliance with the terms and conditions of its subaward and prime agreements prior to initiating the payment process.
7. Prepares and submits monthly grant/contract reconciliations to various divisions to assist with the financial management of projects.
8. Prepares, signs and submits invoices, drawdowns, and letters of credit to sponsoring agencies. The GCA post-award manager is the designated position that can bind CWU with these actions (2 CFR 200.415). When the post-award manager is not available, the Director of Financial Services and/or Controller is authorized to submit these actions.
9. Responsible for fund collection, depositing and accounts receivable on grants/contracts, as well as performing follow-up with any non-paying sponsors.
10. Prepares and submits monthly, quarterly and/or annual financial reports to sponsoring agencies.
11. Upon request, provides principal investigators (PI) with detailed reports or projections of grant/contract expenditures and encumbrances.
12. Responsible for federal effort certification and documentation that includes form preparation, completion, following up on incomplete or late reports and providing expertise and guidance regarding the University's effort certification process.
13. Preparation and negotiation of the federal reimbursement rate for facilities and administrative (F&A) expenses incurred in support of sponsored research and other sponsored projects.
14. Consults with departments and makes process recommendations to enhance internal controls.
15. Prepares Fund 145/146 financial statements and CWU's federal disclosure form (SEFA) to OFM.
16. Since all externally sponsored awards are subject to sponsor review and/or audit, GCA is responsible to respond to external audit requests. This includes the annual audit of federal awards required under 2 CFR 200.

17. Provides post award fiscal and compliance training to the University in group and/or one-on-one type training to assist faculty or staff with topics pertaining to sponsored administration.

If a deficit or disallowance occurs under a grant or contract project id/speedkey, the principal investigator, in consultation with his chair or dean, is to advise the GCA as to the appropriate disposition. After-the-fact transfer of expenditures from one grant or contract project id/speedkey to another grant or contract project id/speedkey to correct a deficit or disallowance is usually not acceptable as stringent audit requirements apply to such transfers under federally-funded grants and contracts.

The University has not budgeted separate funds for covering grant or contract deficits or disallowances so alternative sources should be funded by the principal investigator, departmental and/or divisional resources such as indirect or F&A.

Questions relating to accounting matters, or requests for assistance in the establishment of record-keeping systems for monitoring grant and contract expenditures, should be directed to GCA.