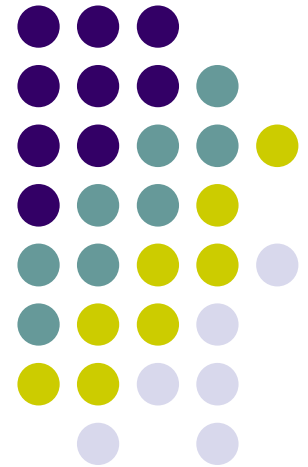
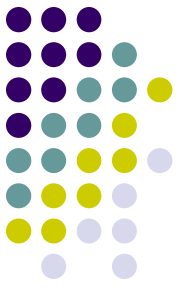


Managing your Grant Award

Fiscal Responsibilities of Post Award Administration

Provided by Office of the Comptroller
Grants & Contracts Staff

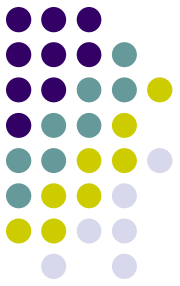




Grant vs. Internal Order

- Grant – is awarded to NKU by an external source.
- Internal Order/Funded Program – is an award made by NKU to an NKU employee for an approved project. For example:
 - Community Partnership
 - Faculty Projects
 - Undergraduate Research Awards

Office of Research Grants & Contracts



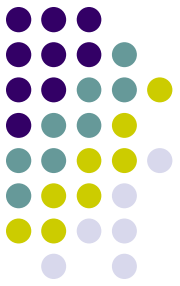
- RG&C is your pre-award resource for assistance and guidance when looking for grant funding.
- Is dedicated to assisting faculty and staff in obtaining external funds while making the process as simple as possible.
- Will help find a funding source, assist with preparation of the proposal for submission, negotiate pre-award issues and act as a liaison between the grant sponsor and NKU.
- Will initiate the grant set up in SAP once a proposal is awarded.

Office of the Comptroller

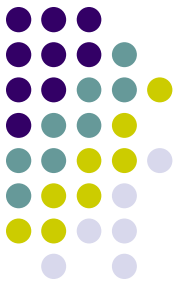


- The Office of the Comptroller is your post-award resource for all matters concerning your grant or contract funding.
- The mission of the Office of the Comptroller is to establish and maintain efficient accounting, budgetary systems and controls which demonstrate accountability and effective stewardship of the university's and foundations' financial resources.
- Will provide timely, useful financial information and services to all constituencies.
- Included in this office are general accounting, budgetary control, grants & contracts administration, accounts payable, and treasury functions.

Office of the Comptroller

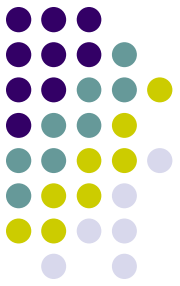


- The Office of the Comptroller will administer your grant account through NKU's financial system (SAP) following the specific guidelines of your granting agency.



Good to know...

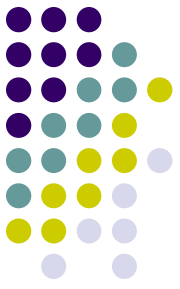
Funding Agencies make awards
to the University,
not to the
individual Principal Investigator (PI)



Overall PI Role

While the University is legally responsible for the stewardship of an award, the *PI's role* is to manage the effort in compliance with:

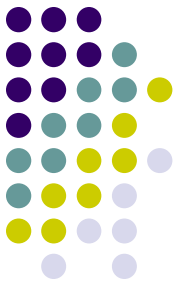
- Applicable federal and state regulations
- University policies/procedures
- Funding agency's agreement



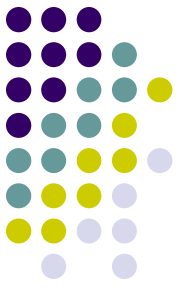
Funding Sources

- Federal Government
- State Government
- Local Government
- Private (Business, Industry, Foundation, University)
- Federal Flow Thru (awards made by a state/local/private organizations but original funding source is a federal agency)

The Principal Investigator (PI)



- While the PI may delegate tasks to others associated with the award, the accountability and overall responsibility ***always*** remain with the ***PI***.
- The signature and/or approval authority remains with the PI. ***There are no exceptions.***

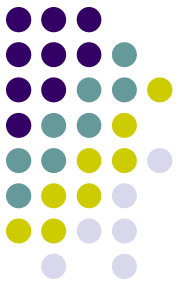


If NKU and/or PI does *not* comply, consequences can be...

- Disallowed costs
- Reduction in grant funding
- Termination of grant award
- Return of grant funding
- Damaged reputation
- Jeopardize future grant funding



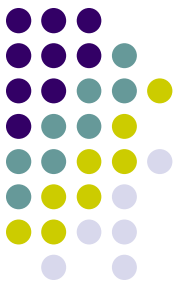
Time & Effort Non-Compliance Consequences (examples)



Failure to meet requirements places the University at risk for audit disallowances resulting in significant financial penalties.

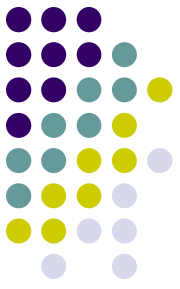
- Northwestern University \$5.5 million
- University of Southern Florida \$4.1 million
- Johns Hopkins \$2.6 million
- Harvard University \$3.3 million
- University of Alabama Birmingham \$3.39 million.

Time & Effort Non-Compliance Consequences (cont.)



- **University of North Texas Health Science Center (UNTHSC)** agreed to pay the United States \$13,073,000 to settle claims that it inaccurately measured, tracked and paid researchers for effort spent on certain NIH-sponsored research grants.
- UNTHSC failed to ensure that its time and effort reports were accurately and timely certified for the period January 2011 through February 2016.

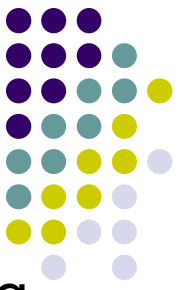
<https://www.justice.gov/usao-ndtx/pr/university-north-texas-health-science-center-pay-13-million-settle-claims-related>



PI Key Responsibilities

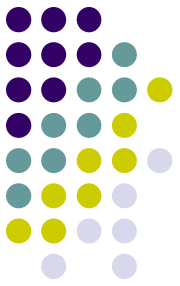
- Managing overall grant award *and* any changes
- Authorizing and reconciling **expenses**
- Purchasing and **equipment** accountability
- Defining, hiring, and managing **NKU personnel**
- Managing **external individuals** (sub awards, consultants, contractors)
- Managing **travel**
- Submitting **progress/technical reports**
- Keeping proper **records/receipts**

Managing grant award

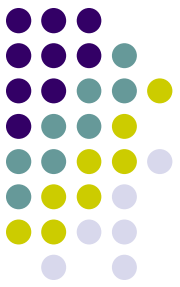


- Executes as outlined in award agreement: the deliverables, timeline/deadline, budget, and staffing.
- The PI is the *only* NKU authorization for purchase requisitions, travel documents, interdepartmental bills (IB), budget transfer requests, Personnel Action Requests (PAR), and Time & Effort Certification, etc. Not the chair or dean.
- Follows all NKU policies/procedures including those related to **compliance** (human subjects, conflict of interest, recombinant DNA, animal care, biosafety, and financial).
- Communicates research misconduct, misuse/abuse of funds, or fraud at this link
<https://secure.ethicspoint.com/domain/media/en/gui/39421/index.html>

Grant Budgets



- If a budget revision is needed the PI must e-mail Barb Smith with the budget transfer request.
- If a budget revision requires sponsor approval, the PI should work with RG&C.
- Only the Comptroller's Office can complete a budget transfer within a grant.
- No budget revisions can be done to transfer funds into or out of a grant.



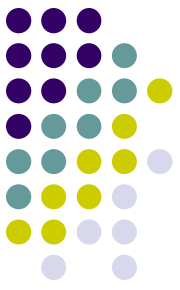
Expenditure Monitoring

- Monitor cost spending to ensure it is **necessary, allowable, and reasonable** for awarded effort and is **consistent** with NKU's policies, applicable state and federal regulations and per the sponsor agreement.
- Keep all cost spending within funding period – do *not* stockpile supplies near end of grant.
- Ensures receipts and cost records are maintained. Original procard receipts must be retained by the PI.
- The PI understands cost share and/or third-party matching requirements. Ensures documentation is obtained, certified, and reported to Comptroller's Office.
- Attends training on use of NKU SAP system to manage grant spending. Then, monitors and reconciles SAP grant/match account monthly.

Expenses (cont.)



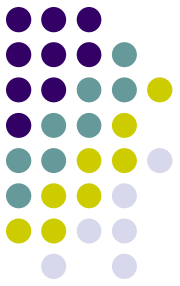
- The grant end date is the date on which all work under the grant/contract agreement should be completed, or the date on the agreement on which sponsorship ends. All expenditures must meet a reasonable and necessary test to be allowable charges. It is extremely difficult to defend large or numerous expenditures in the final weeks of a project. Many times such costs are disallowed because the PI was trying to “spend all the money”. At times, written justification may be required for large expenses incurred or requested during the final weeks of a project.



Expenses (cont.)

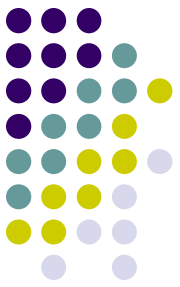
- Grants have a begin date and an end date. No expense can occur **before** the begin date or after the end date; any items purchased for the grant must be received on NKU campus **before** the grant end date.
- Use on-campus services (University Printing, Food Services, etc.). If necessary services are not available, Procurement Services must approve the use of an outside vendor.

Expenditure Recode/Payroll Retro (Reallocation)

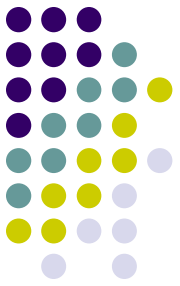


- A recode is an after-the-fact reallocation of expenses.
- A retro is an after-the-fact payroll correction.

Expenditure Recode



- Must be submitted within 60 days of the original expense posting date. The deadlines will be different during fiscal year end and will be posted on the Comptroller's website.
- Recode requests are submitted through myNKU using the FI Request tab.
- All recode requests must be timely, documented and explained in detail, adhere to the sponsor's standards and have appropriate approvals.
- The academic coordinator can initiate the recode request and it will workflow to the PI for approval

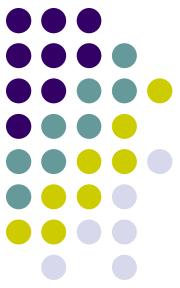


Payroll Retro

- Must be submitted by the deadlines posted periodically in ThisWeek or on the HR's website.
- Fill out the Labor Distribution Discrepancy form located on HR's website and return to Tonya Smiley

<https://inside.nku.edu/hr/managers-toolkit/retrocutoffdates.html>

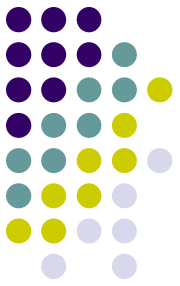
- The form will need to be signed by the PI.



InterDepartmental Bill (IB)

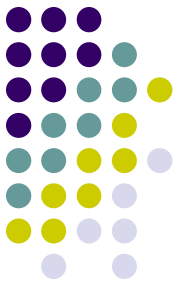
- Is a charge to a University or Foundation cost center/grant/internal order for a service provided by another University or Foundation cost center/grant/internal order.
- The department providing the service initiates an IB through myNKU using the FI Request tab and it will workflow to the PI for review and approval of the expenditure.

Purchase Requisition



- University requisitions require approval for any purchases over \$500 but all grant requisitions must be approved by the PI.
- The more information that is included in the requisition the better. Use the comments section and attach documentation (still need to submit original documents to Accounts Payable).
- Grant PI will need to approve all purchase requisitions either in Universal Work List (UWL) or their SAP Workplace.

Procurement Decision Tree

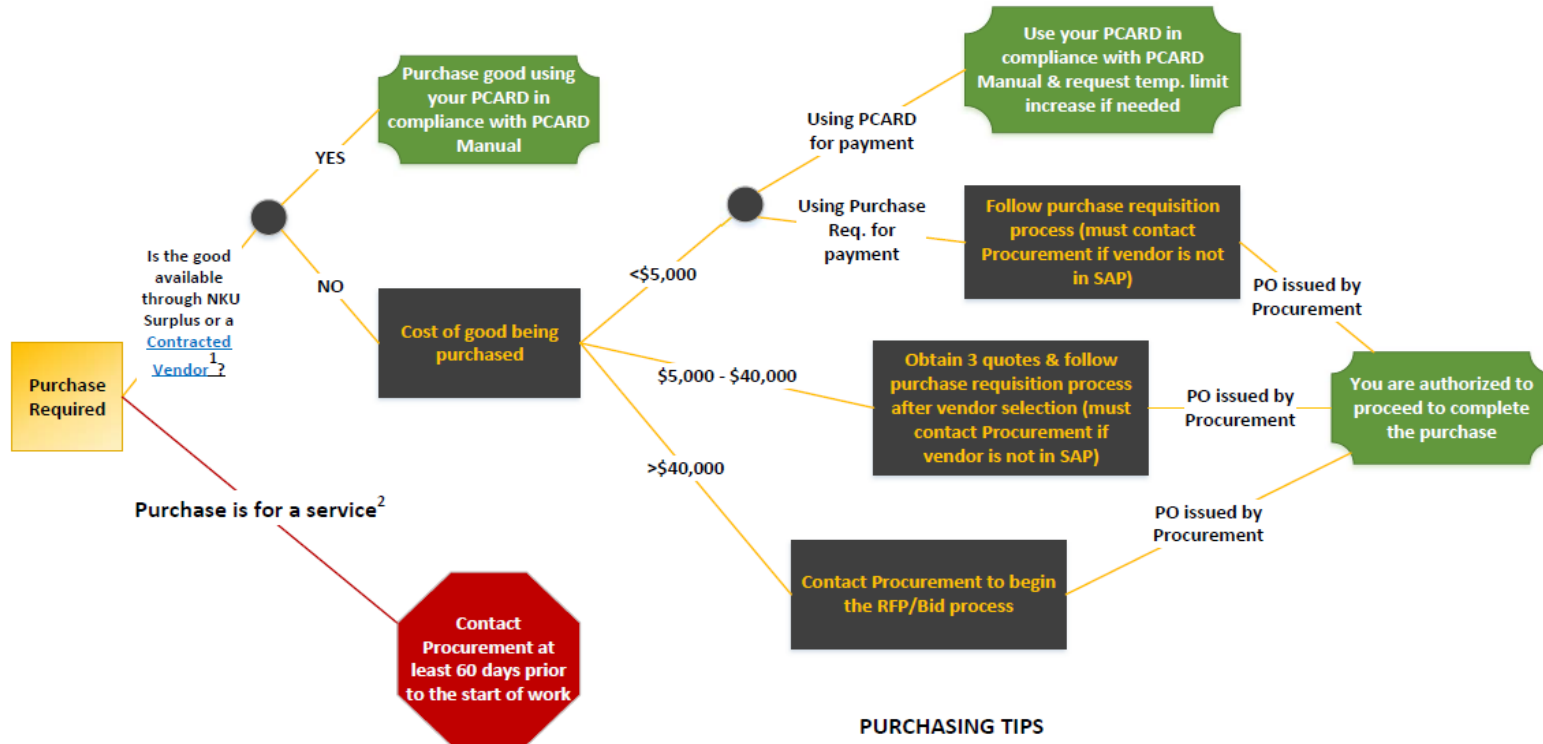


ALL NKU purchases **must** comply with Kentucky Model Procurement Code [KRS 45A](#).



ALL non-PCARD purchases **must** have a Purchase Order (PO) issued by Procurement Services **PRIOR** to the purchase.

ALL PCARD purchases **must** comply with policies found in the [PCARD manual](#).



¹ Contracted Vendor examples include:

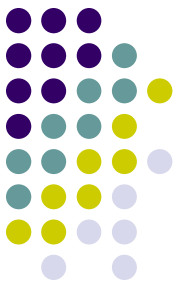
- BARNES & NOBLE
- STAPLES
- AMAZON
- ABS
- CHARTWELLS
- ENTERPRISE RENTAL CAR

² Definition of Service:

Any professional or general service work performed which does not result in the delivery of goods or materials. Examples include, but are not limited to: repairs, training, consulting.

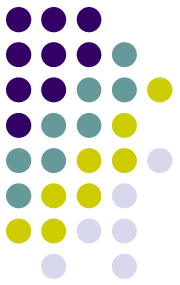
PURCHASING TIPS

- If you have any questions regarding the purchasing process, contact Procurement at (859) 572-5265 or by clicking [here](#).
- Allow adequate processing time. Contact Procurement at least **60** days prior to the start of work or the purchase.
- Consider Purchase Order or Contract needs during budget planning.
- All contracts **must** be reviewed by Legal Affairs.
- Contracts can only be signed by those with signing authority.



ProCard

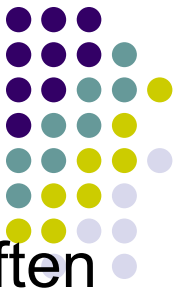
- ProCard transactions can be reconciled on a daily and/or weekly basis.
- Procurement uploads the reconciled ProCard charges once a week.
- Billing cycle ends on the **25th** of every month & the final reconciliation must be completed within 7 calendar days after the 25th.
- If the grant purchases are not reconciled at the end of the month they will be charged to the PI's department cost center.



ProCard (cont.)

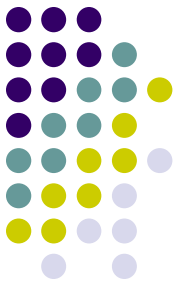
- Make sure the original ProCard receipt is kept with the PI's grant paperwork.
- Penalties for not reconciling the ProCard can be found on Procurement's website.
- More information on University procard policies & procedures can be found on Procurement's website.

Food Expense



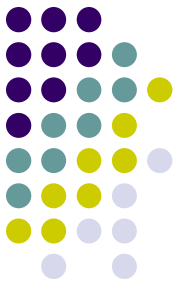
- Food expense is an expense that is scrutinized and often disallowed
 - For federal & federal flow thru, food purchases must have been approved in the grant award
 - Food must be for a meeting or educational purpose
 - Food cannot be for entertainment purpose
 - No alcohol is allowed on grants
- Meals and Entertainment Form is on Procurement's website
 - This form is required anytime there are food purchases charged to a grant
 - Attach to the detailed receipt & keep in the grant file

https://inside.nku.edu/content/dam/Procurement/docs/carddocs/meals_entertainment.pdf



Equipment

- Contact NKU Procurement *before* purchases of (or commitments to purchase) equipment greater than \$5,000 from a vendor are made.
- Coordinate all technology, PC, and software purchases through Procurement/IT departments. If not, risks are:
 - Jeopardize NKU security infrastructure
 - NKU may already have a site license (enabling a cost savings)
 - NKU may have contracts with Vendors that offer a better price
- Do *not* use ProCard for technology purchases! Seek support from NKU Procurement.



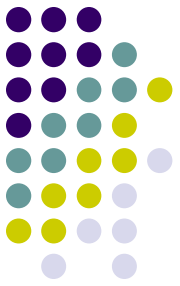
Equipment (continued)

- Recognize that any equipment purchased becomes the property of NKU.
- Disposal procedures of federally funded equipment are on the post award grants website.



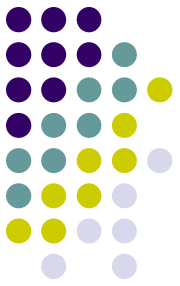


NKU Personnel



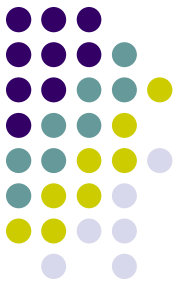
- Adhere to signed NKU Conflict of Interest form as it relates to hiring personnel.
- Work with NKU Human Resources to understand University staffing policies on generating JAQ's, hiring employees and preparing Personnel Action Requests (PAR) accurately and in a timely way.
- Manage time and effort reporting for **grant employees**.

Time & Effort Certification



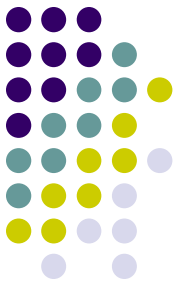
- Faculty and Staff exempt employees are required to certify their time worked on grant projects.
- Time certification is completed thru Employee Self Serve (ESS) within myNKU.
- Time certification approval is completed through the Universal Worklist (UWL) within MyNKU.
- Time certification can be done electronically on a monthly basis, however at a minimum it must be completed each semester.

Faculty Summer Salary Request Form



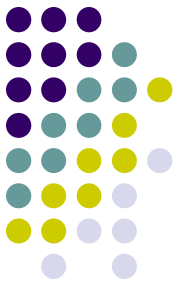
- The Office of the Comptroller will email the [Faculty Summer Salary Request Form](#) to grant PI's that have faculty summer compensation budgeted in their grant(s). This form will need to be completed by all faculty that will receive summer pay on grants.
- The form should include all summer time commitments and the associated compensation that the faculty member expects to receive during that summer (summer class, advising payments, grant payments, etc.)

Summer Supplemental Compensation Form (cont.)



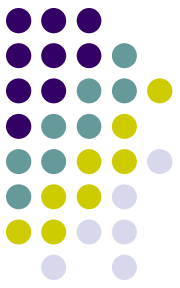
- Summer Salary Calculation for Grants
 - ex. AY Salary = \$50,000
 - 1 Month Rate= \$5,555.56 (Annual rate/9)
 - 1 Week Rate= \$1,388.89 (Monthly rate/4)
 - Maximum Amt*= \$13,888.89 (Monthly rate * 2.5)
- *2.5 month summer salary is the maximum allowed for all summer work

Summer Supplemental Compensation Form (cont.)



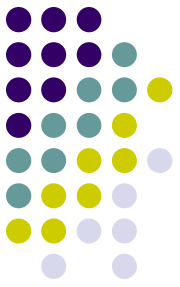
- On the form faculty should identify by project the number of weeks or months being committed and the total anticipated summer salary.
- All parties must sign under the “signatures” section.
- At the end of the summer the Office of the Comptroller will e-mail the previously completed form to the faculty member and request that they certify their time.

Summer Supplemental Compensation Form (cont.)



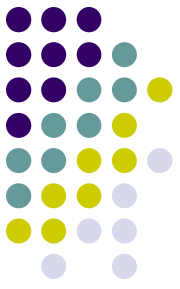
- If their actual time worked changed this change should be noted on the form and the office of the Comptroller notified.
- If the time commitment on the form is correct, the faculty should sign and date in the section “after the fact summer time certification”.
- If the faculty member is not the PI, then the PI will need to sign and date as the approver. If the faculty member is the PI, then the Chair will sign and date as the approver.

Biweekly Time & Effort Certification



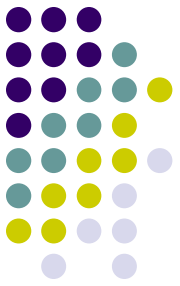
- Biweekly employees (including student employees) input their time worked in employee self service (ESS) in myNKU.
- The employee should print the time sheet and submit it to the PI for the grant they are working on.
- The PI should sign the time sheet and verify the hours worked and the cost distribution
- The signed time sheet should be kept in the grant file.

Student Personnel



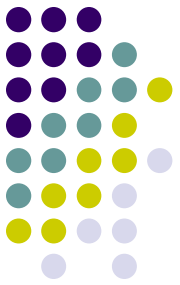
- Work with Office of Student Financial Assistance to correctly hire and pay students
- Work with Payroll Office to complete student research stipend forms
- **Note: Social Security Expense**
 - There are no social security charges on all student payroll (including student stipends) during the summer if the student is taking 3 or more credit hours for the summer term.
 - There are no social security charges on all student payroll (including student stipends) during the fall or spring term if the student is taking 6 or more credit hours during the applicable term.

External Contractor/Consultant



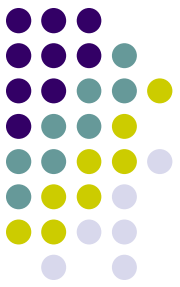
- Contact NKU Procurement *before* contracting with an individual or firm to perform any service/work.
- Procurement will assist with the creation of the **Personal Services Contract**, which is required by state law.

Travel



- Ensure all travel charges include relevance to project's scope (what, where, who, how).
- Ensure travel on grants follows all NKU travel policies.
- Travel must be the most economical for all individuals traveling on the grant.
- Foreign Travel must be specifically allowed in the grant agreement or the PI must receive authorization from the sponsor.

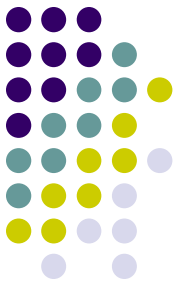
Grant Unallowable Cost



The U.S. OMB Uniform Guidance establishes the principles for determining costs applicable to federal grants, contracts and other agreements with educational institutions. The principles are designed to provide that the federal government bear its fair share of the total cost, determined in accordance with generally accepted accounting principles, except where restricted or prohibited by law.

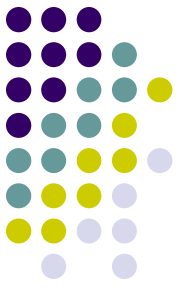
<https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1&rgn=div5>

Grant Unallowable Cost



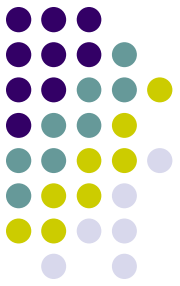
The basic considerations for determining the allowability of costs are located at the link below.

<https://inside.nku.edu/comptroller/grants.html>



Reporting

- The PI is responsible for understanding progress/technical reporting requirements as outlined in the award. All progress/technical reports should be submitted on time using the specified format. A copy of any final reports should be sent to the Comptroller's Office.
- Understand that any requested financial reports/information must be prepared by NKU Comptroller's office.



Record/Receipt Keeping

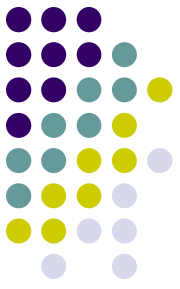
- Assures integrity and safekeeping of all related files (including & especially procard receipts, reports etc.) for time period stated in funding agency and NKU's policies.
- Comptroller's Office sends a closing memo to PIs approximately 90 days before the grant end date. The memo includes how long the grant documents/receipts should be kept.



Grant File

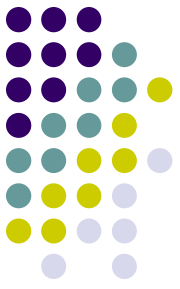
- The PI is responsible for maintaining the grant file.
- If the PI leaves NKU employment the grant file should be maintained by the PI's department Chair.

University account/grant account differences

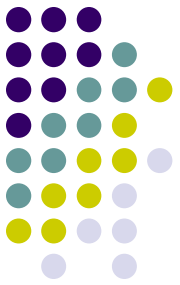


- Grant period may differ from university fiscal year (July 1 – June 30)
- Grant may have a different closeout date than June 30.
- Grants use different budget rules than NKU.
- There can be different budget rules/pools for each grant.
- The SAP reports for grants are different from the University reports.

University account/grant account differences (cont.)



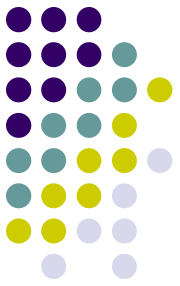
- Budget flexibility is not the same as for University accounts
- Allowable/unallowable expenditures per NKU may differ from grants
- Allowable/unallowable expenditures permitted by funding agencies may differ
- No transfer of funds into or out of grant accounts are allowed
- Grant Budget transfers can only be completed by the Comptroller's Office



Grant SAP Coding

- Grant numbers are 7 digits (start with 400xxxx)
- Cost center numbers are 9 digits
- Match cost centers end in 50
- Grant cost centers end in 55 or 65
- Program revenue cost centers end in 59 or 69
- Grant expenditures require a cost center and a grant number.

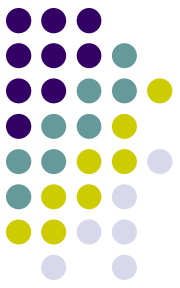
Grant Management Reporting



The grants management report interface is within myNKU. PIs can select their desired grant to quickly and efficiently review and reconcile their grant within this one user-interface. The report is located at:

https://mynku.nku.edu/irj/servlet/prt/portal/prtroot/pcd!3aportal_content!2fcom.sap.pct!2fplatform_add_ons!2fcom.sap.ip.bi!2fiViews!2fcom.sap.ip.bi.bex?TEMPLATE=ZCM_GRA_NTMGT_WT001&DUMMY=0

Help and Training Links



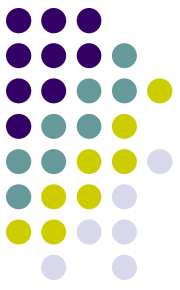
- Post Award Grant Administrative Website
<https://inside.nku.edu/comptroller/grants.html>
- myNKU website for grant SAP support information:
<https://inside.nku.edu/mynkuhelp/tabbased/grants1.html>
- Grant SAP Training – to register for a SAP grant training course (FI 202 - Grants Management Overview & Reporting):
<http://pod.nku.edu/podreg/allevts.asp?sort=date>

Post Award Grants & Contracts Administration Staff



TITLE	NAME	TELEPHONE	E-MAIL	DUTIES
Director of Research Foundation Accounting/ Grant Administration	Barb Smith	(859) 572-6456	smithba@nku.edu	Setup/maintain grant master data in SAP, approve all Budget Entries, Journal Entries, PR Retros, invoices/financial reports, meet with PI's, sub recipient monitoring, F&A, tuition, SAP grant enhancements, grant close out
Grants & Contracts Manager	Lisa Burson	(859) 572-7619	bursonl@nku.edu	Prepare federal cash draws and federal financial reports, foundation subgrants, Stream Corridor, RFDN 990, NSF Survey , RFDN QTRLY reports, NKU RCF QTRYLY reports
Senior Grant Accountant	Rob Hartbarger	(859) 572-5614	hartbarger1@nku.edu	Review/approve purchase requisitions, travel & procard transactions, prepare invoices/financial reports, deferred revenue, monitor accounts receivable, review/approve interdepartmental bills and grant recodes;
Senior Analyst, Budget & HR Integration				Grant payroll review/reconciliations, review grant PAR's, set up release/reassigned time, prepare payroll retros/corrections, campus based programs, grant training, time & effort tracking
Staff Accountant	Khloe Geiger	(859) 572-1978	geigerk3@nku.edu	SAP entry of journal entries and budget entries, credit balance report, maintain invoice/reporting calendar

In summary



- When a grant award is made, a new PI will be required to attend a “post award” meeting with Barb Smith, Director of Research Foundation Accounting and Grant Administration. The PI responsibilities and grant budget will be reviewed in detail at this meeting.
- All returning PIs will be sent an e-mail with the necessary information for the new grant award and asked to contact Barb Smith if they would like to set up a meeting to discuss the new award.
- When in doubt on anything related to your grant, ask any grant staff in the Office of the Comptroller.