

Post-Award Service Functions to Principal Investigators

The purpose and function of a Post-award office is to assist the Principle Investigator with the fiscal and compliance management of their grant. Services provided by this critical office, help to ensure that the PI and the institution are not vulnerable to audit findings or worse, as well as to ensure that the post-award administration of an award is as smooth as possible requiring minimal administrative effort on the part of the PI. This office works with the PI to ensure that they are able to complete the scope of work proposed and for which an award was granted. The Post-award staff will act as the liaison between the PI and the sponsor, administrative offices on campus, compliance committees, vendors and sub-recipients.

- The Office of Sponsored Programs (OSP) will transfer control of an award once final negotiations have been completed to Post-award staff (Business Office).
- It is OSP's responsibility to request the establishment of a Banner account for the award from the Business Office. It usually takes a bit of time to have an account established and so the PI will need to be patient for just a bit more until the Banner account is established.
- At that point the PI will be notified about their account number and asked to join a Post-award representative to talk about administration of their award.
- This will include guidance to the proper regulatory processes on campus, such as IRB, IACUC, paperwork required to hire staff and how to expend funds. A review of the policies and procedures of OSP/Business Office will be provided. The terms and conditions as well as the budget will be reviewed with the PI so that a clear understanding of what is allowable is shared between Post-award and the PI.
- An explanation of the means by which a PI can access their account balance is provided along with ideas of the lag time currently experienced for processing requests to expend funds.
- The Post-award office functions as the purchasing point for the PI. They ensure that expenses requested to be posted against a certain grant adhere to the Cost Accounting Principles outlined in the Office of Management and Budget's Circular A-21 are followed. The core of these principles include allowability, which basically means: "(a) they must be reasonable; (b) they must be allocable to sponsored agreements under the principles and methods provided herein; (c) they must be given consistent treatment through application of those generally accepted accounting principles appropriate to the circumstances; and (d) they must conform to any limitations or exclusions set forth in these principles or in the sponsored agreement as to types or amounts of cost items." In

addition the expenditure must be incurred within the term dates of the award. For more detailed information please see: http://www.whitehouse.gov/omb/circulars_a021_2004

- Post-award tracks the expenditure activities of each grant to ensure that charges are properly posted to the grant and that no improper charges are made. They ensure that errors that may occur elsewhere such as using the wrong account number or unauthorized expenditures do not hit the PI's account. Monthly reconciliations are available for review by the PI or their designee.
- In the monitoring of the award, Post-award tries to ensure that programmatically, the project is on track. Since the budget is the fiscal narrative of the proposal, the activities of the program should follow how the budget is being expended. If the award is coming to a milestone or towards its termination date, the Post-award staff will contact the PI to ensure that they are aware of the milestone or term date. A separate close-out procedure managed by the Post-award office is in place will be discussed shortly. This type of follow-up with the PI also ensures that charges that should be applied to the grant are getting there. It may be that a charge was inadvertently charged to the department rather than the grant. This has negative connotations for two reasons. First, obviously the department did not budget for the expense and second, the sponsor is expecting the expenditure to appear on their award. If it does not, they can easily assume that the proposed budget was incorrect or that the portion of the scope of work associated with this expenditure was not accomplished.
- The need for the PI to play an active role in monitoring their fiscal award is key to ensuring that proper expenditures are applied and improper ones are removed in a timely basis. According to the Office of Management and Budget 90 days from the posting of an error to its ultimate correction is timely.
- Other services provided by the Post-award office are the tracking of cost sharing or matching which would have been agreed to in the proposal process and effort reporting. To track cost sharing or matching, actual expenses or in kind activities must be identified and documented as being part of work of the project. Effort reporting has to do with a PI or other Key Personnel included in the proposal and award and the amount of their annual 9 month effort has been indicated that will be expended on the project. Effort cannot exceed 100% of an individual's time or salary. For example, if faculty work a 4 x 4 teaching load, it would be logical to anticipate that they would require at least one course offload in a semester to complete the work described in a proposal. That would mean that the effort certification signed by the PI would need to verify that 12.5% of their time during a semester was spent on the project. If it was 1 course per semester then the effort certification would indicate that the faculty member had been released from one 3

credit course for both semesters to work on the awarded project or 25% of their effort. Summer effort is limited to 2/9ths of the faculty member's salary or 2 months of summer spent on the grant work. Their effort if 2/9ths would be 100% of their summer.

- A close out procedure has been implemented to assist the faculty member as well as the grant accounting office. At 90 days prior to the term date, a notice will be sent to the PI indicating that they have 90 days remaining and asking if they would like to request an extension or any budget modifications from the sponsor to ensure completion of the work. At 60 days prior to the term date, a second reminder will be sent to the PI repeating the information in the first notice as well as an indication that all purchasing should be completed prior to the 30 day mark. Expenses will be applied to the grant during its final month, but they should not, as a rule, be initiated during the final days without justification. Payroll is the exception from this rule. This procedure provides the PI important timing information and opportunities for the Post-award to take action with the sponsor on their behalf. It also allows the Grant Account ample opportunity to capture all costs associated with the grant thereby ensuring that the institution does not absorb grant related costs and that the sponsor is billed for their anticipated amount.
- A notice during the final year of the award will also come to the PI from the Post-award office suggesting that the PI contact the Pre-award office to start to seek out funding for continued or new programs. They may suggest that a conversation be started with the Program Officer of the current funding source to identify if that agency wishes to continue funding the PI's work as well.