

PROCEDURE TITLE:	GRANT COMPLIANCE REQUIREMENTS
PROCEDURE NO.:	5.13:2
RELATED POLICY:	5.13REV
PAGE NO.:	1 OF 3
RESPONSIBLE PARTY:	DIRECTOR, GRANTS & SPONSORED PROGRAMS
EFFECTIVE DATE:	02/03/2025
NEXT REVIEW DATE:	02/2030
APPROVED BY:	PRESIDENT

1.0 COMPLIANCE WITH APPLICABLE POLICIES & REGULATIONS

- 1.1 The Principal Investigator for each grant award, including awards with the University acting as the Lead Applicant or as a Subrecipient, in cooperation with the Office of Finance and Administration and the Office of Grants & Sponsored Programs, will ensure that all internal University policies and procedures, including but not limited to policies governing Procurement, Travel, Meeting Expenditures, Cash Management, Human Resources, Information Technology and Communications, and Grants Application Approval and Management, will be followed as applicable to funding and activities covered by the grant award.
- 1.2 The Principal Investigator for each grant award, in cooperation with the Office of Finance and Administration and the Office of Grants & Sponsored Programs, will ensure that all other applicable policies, regulations, and agreements are followed, including but not limited to the Grant Agreement, Memorandums of Understanding (MOUs), and state, local, and federal statutes, ordinances, and regulations. In situations in which requirements differ between University policies and procedures and other applicable guidelines, the stricter requirements or guidelines must be followed.
- 1.3 The Principal Investigator for each grant award, in cooperation with the Office of Grants & Sponsored Programs, will ensure that the Budget and Scope of Work as contained in the Grant Application and/or Grant Agreement are followed unless amended as required by the awarding agency.

2.0 FINANCIAL MANAGEMENT OF GRANT AWARDS

- 2.1 Financial transactions related to grant awards will be tracked in the University's financial management system through the use of restricted accounts, proper expense object codes, and project codes. Additionally, supporting methods of tracking grant budgets, expenditures, and in-kind match outside of the financial management system may be utilized when necessary or practicable.
- 2.2 In order to be allocated to a grant award, both direct and in-kind expenditures must be thoroughly documented, valued in accordance with applicable policies and regulations, and properly verified by an appropriate responsible party. Costs must

be allowable under the terms of the award, incurred within the award period, and reasonable and necessary for the implementation of the award.

- 2.2.1 For personnel costs, expenditures must be supported by completed Time and Effort reports signed by the appropriate supervisor and submitted to the Office of Grants & Sponsored Programs on a monthly or otherwise agreed-to basis. This requirement applies to both direct personnel costs and personnel costs used as a source of matching funds.
- 2.2.2 Expenditures such as supplies, equipment, contracts, travel, etc. will follow standard University Procurement policies and procedures, including all necessary requisitions, justifications, pre-approvals, travel authorizations, and competitive bidding requirements, as well as all other applicable policies and regulations.
- 2.2.3 Participant Support Costs refer to direct costs supporting the involvement of participants in a federal award and include items such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, per diem, etc.
 - 2.2.3.1 A Participant is an individual participating in, receiving services from, or attending program activities under a grant award that is not responsible for the implementation of the award. Examples include, but are not limited to, scholarship recipients, conference attendees, and individuals receiving services from community outreach programs.
 - 2.2.3.2 Participant Support Costs must generally be tracked and reported separately from general program expenditures. .
- 2.2.4 The allocation of In-Kind or Third-Party property or services as matching funds requires additional computation and documentation, and may require tracking outside of the University financial system.
 - 2.2.4.1 The Principal Investigator is required to provide documentation, invoices or similar documents, containing the description, source, and value of property or services to be used as matching funds to the Office of Grants & Sponsored Programs on a monthly or otherwise agreed-to basis.
 - 2.2.4.2 The value of donated or volunteered third-party services allocated as matching funds must be consistent with the market rates paid for similar work and must be properly documented.
 - 2.2.4.3 The value of donated property included as matching funds may not exceed the documented fair market value of the property at

the time of donation.

2.2.4.4 Employee services donated by a third party must be valued at the employee's regular rate of pay plus allowable and allocable fringe benefits and indirect costs, if applicable.

2.2.4.5 In the absence of documentation meeting the above requirements, property or services may not be allocated as matching funds.

3.0 SUBRECIPIENTS

3.1 A Subrecipient of a University grant award may not perform any services under the award prior to the execution of a Subrecipient Agreement prepared and/or approved by the University's Chief Legal Counsel.

3.1.1 For federal subawards, the Subrecipient Agreement must include the Subrecipient's legal name, Unique Entity Identifier issued by the federal System for Award Management, Federal Award Identification Number, Award Date, Subaward Period of Performance Start and End Date, Subaward Budget Start and End Date, the Amount of Federal Funds Obligated and Committed to the Subrecipient, names and contact information for the awarding Federal agency and the University, Assistance Listing Number(s) for the award, an indication as to whether the award is for research and development, the Indirect Cost Rate for the federal award, and all requirements of the subaward.

3.2 The award related activities of Subrecipients of University grant awards will be monitored in accordance with all applicable guidelines through review of financial and performance reports, audit review, and verification of corrective action taken in response to audit findings related to the award.

History

Effective: 02/03/25