Accounting Services for Research and Sponsored Programs (ASRSP)

Research Accounting
Mission

To provide exceptional financial administration to sponsored research grants and contracts.

We are committed to the highest standards of financial stewardship and compliance with both University and sponsor regulations.
Other Related Northwestern Offices

- President
  - Provost
    - Vice President for Research
    - Office for Research
  - Executive Vice President
    - Vice President of Financial Operations & Treasurer
      - Executive Director for Research Financial Operations
      - Accounting Services for Research and Sponsored Projects (ASRSP)
      - Cost Studies
ASRSP TEAMS

• Cash Management Team – Apply payments
  – Reports to Peg Morrisroe

• Financial Reporting – Financial reporting/Invoicing, Closeout
  – 3 GCFA groups reporting to either Howard Ventura, Felice Patterson or Kathy Mustea (see chart)

• Information Team - various IT and Data reporting
  – Reports to Jarrod Routh

• SubK Team - Responsible for subcontract payment
  – Reports to Kathy Watson

• Special Operations - Audit and Expense review liaisons and the transaction review team.
  – Reports to Svetlana Kanev
Key Functions of ASRSP

- Financial Reporting
- Collecting Revenue
- Coordinating Audits
- Transaction Review & Approval
- Award Closeout
Why is ASRSP Important?

In Fiscal Year 2017 (between 9/1/16 and 8/31/17):

- $747 million in sponsored research expenditures
- 4,922 financial reports submitted
- 7,062 cost reimbursable invoices sent
- 7,506 payments applied in NuFinancials
- 4,748 subcontract invoices processed for payment to subrecipients
ACCOUNTING SERVICES FOR RESEARCH AND SPONSORED PROGRAMS (ASRSP)

OUR SERVICES

The Office of Accounting Services for Research and Sponsored Programs (ASRSP) helps university researchers with financial reporting, invoicing, collecting revenue, coordinating audits, and processing transactions related to their sponsored projects.

ASRSP reports to the Office of Financial Operations. Principal Investigators are encouraged to contact us with questions.

CONTACT

Accounting Services for Research and Sponsored Programs (ASRSP)
Office of Financial Operations
533 Clark Street
Evanston, IL 60208-1112
Phone: 847-491-3385

UNIFORM GUIDANCE

Do you have questions related to the new Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) which are replacing the eight different OMB Circulars? See our Uniform Guidance page for information on what the Uniform Guidance means for your awards.

QUICK LINKS

Effort Reporting

www.northwestern.edu/asrsp/
Spending and Payment Considerations
Audit Topics

- Consultant Payments and Sub-recipient Monitoring
- Travel Reimbursements and Visa Fees
- Equipment Purchases
- Procurement Card Purchases
- Computer Purchases
- Cost Transfers
- Overdrafts
Timeliness of Expenditures

- Timeliness is an increasingly important part of managing sponsored awards
- Federal agencies giving us less time to closeout
- Important to create a spending plan, review it quarterly and reconcile to avoid a loss of funding

General accounting rule: post expenses within 90 days of its occurrence
Dept./College Approvers

• When submitting transactions the department approver should
  – Audit Transaction ...
    • is it following sponsored project regulations (Allowable, Allocable…) 
    • Was the correct account code use 
    • If a Service (Account code that start with 75***) always included a quote or attachment 
    • Verify PI signature (required for some transactions) 
  – Explanation provided is specific and mentions the benefit to the grant 
    • Important for Expense reports, Consulting, Corrections journals, Equipment/computer purchases. 
    • If there is a comment box please place benefit to grant there 
  – ALWAYS attach backup if you have special circumstances 
    • Special circumstances raise red flags at ASRSP you can expedite the approval of your transaction if you attach the budget page or email showing the sponsor allowed you to do something normally not allowed on typical grants
What is a Consultant?

An individual hired to give professional advice or services for a fee

- Person cannot be classified as employee or subcontractor
- A work plan must be in place before any work is completed
- Work must directly benefit the grant
- US residents and non-residents paid differently
Consultants: Work Plan

• Define the work scope, deliverables and payment terms before work begins*

• Payment terms
  – Flat fee for deliverable
  – Hourly rate and expected hours needed for completion of work
  – If the project is long, a monthly deliverable schedule should be worked out so that payment doesn’t exceed 90 days from the start of work for that period
  – Pay always based on receipt of **timely**, itemized invoice

* Note: May be asked for this work plan during an audit
Consultants: Speaker Fees

• Normally not allowable on sponsored projects
• Possible exceptions:

- Conference Grants
- Training Grants
- Specifically included in the approved budget

• Presentation must relate to sponsored project and only individuals involved in project should attend
Consultants: Payment

• Determine if the payment will be made through HR or through Accounts Payable.

• Assuming the consultant is US Resident (A/P):
  – If consultant does not have a Northwestern University vendor code…department must complete an Independent Contract Questionnaire (ICQ) and submit it to HR for review and approval before a vendor code can be issued.
  – Department completes a Contracted Services Form (CSF requires vendor code) and consultant signs: must be after completion of the represented service period.
  – Department creates an online voucher, enters online voucher number on Contracted Services Form, uploads CSF and an invoice from the consultant into voucher in NuFinancials, and submits to ASRSP for review and approval.

• Remember missing information will delay payment
Contracted Services Approvals

Once form is completed and back up has been provided submit the form to ASRSP.

ASRSP will do the following.

1. Review and Audit the form and documentation and approval of fundamental compliance. Approve the Online Voucher

Account Payable will review and approve the voucher and payment will be made.
Interactive Activity

Please work with a partner.

You have 5 minutes to come up with your list of errors. We will discuss the results as a group afterwards.
Contracted Services Form for U.S. Residents

Requestor: Ned Stark
Department: FSM
Phone: 047.555.5555
Email: n-stark@northwestern.edu

This form must be completed each time services are rendered by an individual consultant or independent contractor.

Contractor Information
Name: Joe Contractor
Address Line 1: 1,555 Mulberry Lane
Address Line 2: Apt 1
City, State, Zip: Evanston, IL 60208
Additional Description of Services (for sponsored project, also describe benefit to the award):
Work done per terms for the Department of Education Award

Contractor’s Acknowledgement
I understand that payment will not be issued until performance and completion of the contracted services, and that the date of payment cannot be prior to the work completion date. I understand that agreed upon expenses will not be reimbursed unless I complete a Visitor Expense Report and attach original receipts.

I certify that I have not been paid as an employee of Northwestern within the last twelve months. I understand that this payment does not include any employment benefits or tax deductions and that the payment of these is my responsibility.

Contractor Signature: [Signature]
Date: 6/1/15

University Payment Request
Service start date: August 1, 2014
Service completion date: July 31, 2015

<table>
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<th>Expense Item</th>
<th>Fund</th>
<th>Dept</th>
<th>Project</th>
<th>Act</th>
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<td>Total Payment</td>
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<td></td>
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University Approval
I approve the payment for services and expenses noted above. The cost was incurred in conformance with the current HR policy on Independent Contractors and Consultants on the Northwestern website. If charged to a Sponsored Project account, it is understood and agreed that these expenditures are subject to review and audit and if found to be unallowable, they will be transferred to a non-sponsored departmental account. The payment requested includes only the expenses associated with the contracted services, is not in payment of honorarium or for subsistence, and is not in avoidance of immigration restrictions, Affirmative Action requirements, payment of fringe benefits, statutory taxes, fees, insurance premiums or any other applicable statutory employment regulation.

Approver Name (print): [Name]
Signature: [Signature]
Date: 6/30/15
# Invoice from Services

**Joe Contractor**

555 Mulberry Lane, Apt. 1  
Evanston, IL 60208  
Phone: 847-555-1212  
Fax: 847-555-1200  
jocontractor@nhmail.com

**TO**  
NURULES Center  
Northwestern University  
2145 Sheridan Road, M-111  
Evanston, IL 60208  
847-467-5555

**INVOICE**

**INVOICE # 548**  
DATE: FEBRUARY 15, 2012

<table>
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<th>DATE OF SERVICE</th>
<th>JOB</th>
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<td>9 hours</td>
<td>Editing, formatting &amp; creating winter quarter newsletter for NURULES center</td>
<td>$50/hour</td>
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<tr>
<td>1 hour</td>
<td>E-mail and USPS distribution of winter quarter newsletter for NURULES center</td>
<td>$50/hour</td>
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</table>

**SUBTOTAL** $500.00  
**SALES TAX** $0.00  
**TOTAL** $500.00
Subcontracts Overview

1. PI/institution gets awarded grant or contract from sponsor
2. A portion of the project cannot be completed at Northwestern
3. The sponsor requirements and terms & conditions must be passed down with the subcontract
4. The subcontract generally has a budget for salary, fringe, supplies, etc.
5. Subcontract is written to a PI at outside institution or company to complete portion of the project
Sub-recipient Monitoring

• PI collects and monitors the technical performance of subcontractor

• Subcontractor should submit invoice to ASRSP regularly
  – Final invoice must be received on time

• PI must review invoices to insure that charges reflect the work being done

• ASRSP reviews A-133 reports for sub-recipient institution
Subcontract Payment Process

1. Department creates Requisition in People Soft + Receiver Required (Y)
2. ASRSP receives and forwards invoices to the Department
3. Invoices are certified by PI that costs charged are acceptable and work has been performed
4. Department approves receiver required field in People Soft
5. Invoice returned to ASRSP from Department for processing with Accounts Payable
6. AP sends check to ASRSP
7. ASRSP reviews and then mails check to vendor along with a copy of the invoice
Travel Allowability

• Travel must directly benefit the grant

• Professional development and networking expenses are not allowed on grants

• Costs must be within Northwestern University guidelines

• Travel must be allowed by the sponsor, within sponsor guidelines and award terms.

• Best practice is to read the award!
General Travel Regulations

- Travel must be completed within award budget period
- Working lunches and local meals are not allowable
- Reimbursement can only be made upon completion of travel
- $65 limit per person on meals, including tax and tip
- Alcohol is not allowable
- Original Itemized receipts required unless per diem option is selected prior to travel
- Travelers will be reimbursed for reasonable and actual costs of lodging
- Penalties, fees, and upgrades are generally not allowable
Visa Fees

- Fees for visas are allowable when foreign travel is authorized as part of the budget, and a visa is necessary for travel.

- NIH allows visa fees for employees only for recruitment purposes. Renewal applications are not allowable.

- NSF does not allow visa fees for employees.

- For other federal agencies, the determination of allowability is still pending.
Fly America Act & Exceptions

Federal law prohibits use of a foreign air carrier when travel is paid for by federal funds, with limited exceptions

• US carrier does not service the route

• Excessive delays or layovers to use US carrier

• Medical necessity with sponsor pre-approval

• Use of foreign carrier puts travel at risk

• The grant is not funded by the Dept. of Defense and an Open Skies agreement exists
Open Skies Agreements

- US air carriers are the easiest option for foreign travel

- The Dept. of Defense does not allow an Open Skies exception to the Fly America Act

- Air carriers from European Union members states is allowable non-DOD federal grants

- Travel on an Australian, Japanese or Swiss air carrier may be allowable

- University preferred travel vendors are there to help
Equipment

**Capital Equipment**: $5,000+ and useful life 1+ years

- Uniform Guidance describes equipment use, title, inventory and disposal requirements
- Purchase within final 3 months of grant is audit red flag
- ASRSP reviews and approves equipment expenditures
- Government titled property is managed by ASRSP
Procurement Cards

A tool to streamline low value purchasing transactions. The card does not avoid or bypass appropriate procurement or payment procedures. The card is not used for travel and entertainment purposes.

- Include a detailed description of the item being purchased
- Be sure to keep all backup documentation, such as the pcard log and receipts, for audit purposes
- ASRSP reviews all charges at the end of a grant, including pcard charges, for unallowable items
Computer Purchases

• Must be necessary for and provide benefit to the project

• Only allowable in unlike circumstances

• Must be directly allocable to the project

• Must be reasonable

• Currently in a transition year
  • Stay tuned for Uniform Guidance updates on this topic
Cost Transfers

Support for cost transfers includes:

- Description of the expense item
- Explanation of how the expense benefits the grant
- If it is travel, who traveled, to where, for what and the date of the travel
- Detail why or how the expense was charged incorrectly
- No need to say “moving from project A to project B”
- **Timeliness** very important!
Overdrafts

Expenditures exceeding the awarded amount

- Overdrafts are an uncollectable cost
- Department is responsible for funding these costs
- Transferring overdrafts to another sponsored project is **not** allowable
- Overdrafts typically cannot be transferred to continuation award
- ASRSP will charge department or center chartstring if overdraft is not resolved
### Grants

**Sponsored Research Overview**

- **FMS502 InfoEd Proposal Development**
- **FMS503 InfoEd Approvals**
- **FMS505 Managing Sponsored Projects**

#### Before Class

1. **The Grant Chart String**
2. **Grants Training Plan**

#### Course Session

Register: **FMS505 Managing Sponsored Projects - Classroom**

#### After Class

1. **InfoEd Proposal Tracking**

#### Library

**General**

1. **Managing Sponsored Projects**
2. **Award Management Quick Reference Guide**
3. **Sponsored Research Checklist**
4. **Reading the GM045 Report**
5. **Reading GM045**
6. **Reading the GL008**
7. **Reading GL008**

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http://ffra.northwestern.edu/training/curriculum.html

ASRSP - Spending & Payment
What is Award Closeout?

A collaborative effort to coordinate the completion of a project to meet all requirements and deliverables established as a condition of the award.
Closeout

- Begins 90 days before a grant end

- A time to settle all expenses that belong on the grant and to send final reports due

- Reconciliation throughout the sponsored project period assists with a smooth close out

- Department should strive to post all expenses on a grant by the end date to avoid loss of funding
Closeout Timeline

- **Closeout e-mail**: PI and RADM will receive a closeout email and talk about closeout plans.
- **Prespending?**: Dept requests prespend chartstring for competing continuations.
- **Effort Check**: 30 days before effort reviewed. Respond to emails that require corrections - ASAP.
- **Award End Date**: Grant has ended. No new expenses should post.
- **Finalize Expenses**: Dept follows up on unposted expenses, and communicates status to ASRSP.
- **FFR DUE**: ASRSP reviews expense for allowability and will submit before deadline and close chartstring.

- **No Cost Extension?**: Dept either requests a NCE or begins final spending plan.
- **Review Expense & Encumbrances**: Dept insures encumbrances are valid, reviews expenses to insure they are allowed, and initiates final PO’s or corrections.
- **Internal Services Stop**: Dept should inform lab staff & internal service centers to stop using chartstring.
- **Final Progress Reports**: PI prepares and submits Dept should keep a copy in file ready for auditors’ request.
- **Final Invention Statement**: PI & Dept certifies final effort reports.
- **Final Effort Reports**: PI submits carryover request to OSR if terms require approval.

**Closeout Timeline**

- **-90 to -60 days before**
- **-30 days before**
- **30 days after**
- **60 days after**
~ 90 days before grant ends, ASRSP sends a closeout notice.

Department contacts recharge center and lab staff of changes.

ASRSP GCFA contacts department about report. Includes an approved payroll journal on FFR.

A Recharge center expense posts for period after the grant ends. Somehow they didn’t get the message.

ASRSP sends an FCTR based on NUFIN information. Payroll is not showing up in NUFin but recharge cost is.

In the past, ASRSP would report corrected expenditures on future reports sent. NOW a Grant is closed by Payment Management after 120 days. Award is reduced to lowest number reported.

90 days before Grant ends

Department gets award ready except payroll journal over 90 days old (paper) being processed and moving through approval channels.

ASRSP processes the weekly LOC P subaccount draw within NUFin. Payroll is not showing up in NUFin.

Payroll journal posts in NUFIN after NIH closes grant. Department will have to cover payroll and other unallowable items on department chart string.

120 days after

In the past, ASRSP would report corrected expenditures on future reports sent. NOW a Grant is closed by Payment Management after 120 days. Award is reduced to lowest number reported.
Transfer or Relinquishment

- Complete ESPR request 90 days prior to transfer or close. Please note ESPR is a OSR system.
  - You must also EMAIL –ASRSP GCFA about any transfer or relinquishments.
- Arrangements made for project personnel
- Work with INVO regarding any intellectual property
- Work with Accounting Services for equipment transfers
- Inform ASRSP to prepare financial report and close chartstring
- Follow standard closeout procedures
Federal Government Changes to Closeout

- Uniform Guidance requires reports due 90 days from the end date
- Federal Agencies are now enforcing those rules
  - Ex: Most Federal agencies will have a strict 90 day closeout window
  - NIH and NSF are the exceptions they are granting 120 days but no extension can be asked
- If ASRSP is unable to draw funds and submit the final report departments will be responsible for uncollected funds
- All expenses must be posted in NU Financials within 60 days of the end date to ensure payment
- Final subcontract invoices need special care when closing out
COST ALLOWABILITY FOR SPONSORED CHARGES

In determining whether it is appropriate to charge a given cost to a sponsored project, Northwestern University follows the Federal principles outlined in 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), including the Cost Accounting Standards contained therein, as well as specific terms and conditions of individual sponsored agreements.

For a given cost to be charged to a sponsored agreement, the cost must be reasonable, allowable, allocable, and consistently applied. Please see the Charging Sponsored Projects policy from the Office of Cost Studies. The following guide provides a general practice. However, special circumstances may apply depending on the sponsor’s terms and conditions. If you have questions regarding the allowability of a specific charge, please contact your Grant & Contract Financial Administrator (GCFA).

- Charging Sponsored Projects – Allowability Guide

Tools and Templates for Best Practices:

Developed by various units, the following provides a collection of tools that facilitate the justification of charging sponsored projects:

- Computing Device Justification Form – Developed by Chicago departments
- Sponsored Projects Purchase Justification – Developed by Evanston departments
- Multiple Project Allocation Form – Developed by Evanston departments

A selection of the unallowable costs are listed below:

- Advertising and public relation costs (with specific exceptions)
- Alcoholic Beverages
- Alumni Activities
- Bad Debts
- Commencement Costs
- Contributions and Donations
- Entertainment
- Fines and Penalties
- Goods and Services for Personal Use
- Housing and Personal Living Expenses
- Interest, Fund Raising and Investment Management Costs
- Lobbying
- Memberships in Country Clubs, Social, Dining, or Civic Organizations
- Marketing
Questions?