

LA SALLE UNIVERSITY
GRANT ACCOUNTING, COMPLIANCE AND REPORTING
POLICY & PROCEDURE

October 6, 1995

POLICY/INSTRUCTION

I. Overview

A. Purpose

1. To encourage faculty and staff members to pursue extramural funding and to facilitate their efforts.
2. To control all federal, state and private grants where the University faculty seeks and administers grants or where the University facilities, resources and equipment are used.
3. To limit the financial risks to the University from adverse financial or other actions by the federal government or state and private agencies, involved with overseeing and auditing for compliance with grant requirements.
4. To provide for compliance documentation, proper accounting and timely fiscal reporting in compliance with grant requirements.

B. Responsibility

La Salle University maintains a decentralized approach to grant administration. Primary responsibility for adhering to these policies and procedures rests with the following individuals.

1. Director of Government Affairs
 - a. Assists Project Director in seeking funds from federal, state, and/or local government sources.
 - b. Identifies federal, state, and local government funding opportunities and circulates that information to faculty and staff.
 - c. Helps Project Director secure all required on-campus approvals for proposals for federal, state, or local government funding.
2. VP for Development
 - a. Assists Project Director in seeking funds from corporate and/or foundation sources.
 - b. Identifies corporate and foundation funding opportunities and circulates that information to faculty and staff.
 - c. Helps Project Director secure all required on-campus approvals for corporate or foundation funding.
 - d. Coordinates the proposal review process.
 - e. Assigns a log number to each proposal request.
 - f. Upon approval by all parties, ensures that original documents are signed and submitted on time.
 - g. Maintains initialed copies of the proposal authorization form.

- h. Assists the Project Director in the preparation of payment invoices or requests for reimbursement, if requested.
3. Project Director
 - a. Initiates the proposal for extramural funding by following the Proposal/Grant Review Process.
 - b. Upon receipt of Grant Award Notice, makes a written request to set up an appropriate account for the grant.
 - c. Monitors grant revenue and expenditure. Prepares a monthly budget report which must be reconciled with the report of the Director of Accounting and Budgets.
 - d. Procures matching funds as required by the grant.
 - e. Meets all reporting requirements of the grant.
 - f. Attains the objectives of the grant.
 4. Appropriate Dean
 - a. Reviews and approves the proposal.
 - b. Obtains an understanding of all facets of the particular grant.
 - c. Monitors the monthly budget report.
 - d. Approves payment invoices or requests for reimbursement.
 - e. Tracks the procurement of matching funds.
 5. Provost or Appropriate VP
 - a. Reviews and approves the proposal.
 - b. Authorizes the opening of a new G/L account.
 6. VP for Business Affairs
 - a. Reviews and approves proposal.
 - b. Approves opening of a new G/L account.
 7. Assist. VP for Business Affairs and AA Officer
 - a. Reviews and approves proposal.
 8. Director of Accounting and Budgets
 - a. Opens a new G/L account.
 - b. Sends out paper budget reports/income statements monthly, if requested.
 - c. Assists and approves payment invoices or requests for reimbursement.

II. Procedures

A. Proposal/Grant Review Process

1. Overview. There are three short documents you should obtain as soon as you begin thinking seriously about applying for a grant. All of these may be obtained in the Office of the Provost or VP for Development.
 - a. "Internal Approval of Grant/Funding Proposals: Overview of the Process," a two-page overview of the process, and "proposal

Authorization Form" (PAF), a one-page form to be completed with key information necessary to obtain internal approval.

- b. "Grants Assistance Process". A two-page questionnaire for those who need additional support in getting started.
 - c. "Grant Accounting, Compliance and Reporting: Policy & Procedure". The official University policy document governing external grants.
2. For the internal approval process to begin the applicant must provide:
- a. the PAF Form completed;
 - b. an Executive Summary of the Proposal;
 - c. a Budget Summary; and
 - d. a complete copy of the grant regulations and compliance documents.

This set of documents should be submitted to the VP for Development (VPD) or to the Director of Government Affairs (DGA). The VPD will assign a log number to each PAF that is requested. That number will be used to identify any and all documents that relate to the proposal as it is being prepared and submitted, and to the grant if it is awarded.

3. In addition to the VPD/DGA, the applicant should consult with others as appropriate especially his/her Dean, Provost, and the VP and Assistant VP for Business Affairs regarding the nature of the proposed project, the time commitments of any faculty/staff members who will be involved in the project, and the amount and sources of any matching funds which the University will be required to provide. The Project Director should consult with the VPD/DGA before he/she approaches any funding agency for external matching funds, so that we do not compete with ourselves by requesting funds for a variety of purposes from the same individual or organization. Additionally, the budget should identify clearly any matching funds which the University will be required to provide, as well as the anticipated source(s) of those funds.
4. Under normal circumstances a minimum of one month's time prior to the deadline for submitting the proposal to the funding agency must be allocated for on-campus review. However, it is recognized that such a time period may not be possible in all cases. When that is the situation, the VPD/DGA will assist the preparer by expediting the internal review.
5. Although it is ultimately the responsibility of the applicant to ensure that all necessary signatures are obtained, ordinarily the VPD/DGA will obtain those signatures through an internal consultation process.
6. If any of the designated parties do not approve submitting the proposal, they should communicate their questions and/or objections directly to the originator of the proposal.
7. Once signatures have been obtained, the applicant is responsible to have a final copy of the proposal, the final budget and compliance documents requiring official signatures delivered to the VPD/DGA who will be responsible for ensuring that they are signed and submitted on time.
8. If an application for extramural funding is approved, any grant agreements or contracts pertaining to its implementation that require official signatures should be forwarded to the VP for Development. The VP for Development will circulate copies to the Provost, Assistant VP for Business Affairs/Affirmative Action Officer, and VP for Business Affairs for their review and approval. Once the

documents have been reviewed and approved, the VP for Development will be responsible for having them signed by the appropriate officer(s) of the University and returned to the designated funding source.

9. In the event that the announcement of a grant deadline precludes following the prescribed time sequence, all parties will make every effort to review proposals as expeditiously as possible. However, a PAF must still be completed by the faculty/staff member initiating the proposal and must be signed by all of the designated parties before the official copy of the application/proposal is signed and submitted. Grant applications submitted late for review may not be able to go through the review process and, as a result, may not be submitted.

B. Grant Approval

1. Upon receipt of Grant Award Notice, the Project Director should forward a copy to the Development Office.
2. The VP for Development should notify the designated parties who approved the submission of the proposal of the official Grant Award Notice.
3. The Project Director should request through the Provost or the appropriate VP the opening of a G/L account. This request should be made in writing by the completion of the appropriate University Budget Request Documents submitted to the VP for Business Affairs for approval. The request should also include a copy of the grant award letter or signed contract documents for Business Office files. The Project Director should indicate the appropriate individuals, including the VP for Development, to receive monthly budget reports/income statements generated for the new G/L account.
4. Upon approval, the Director of Accounting and Budgets will send written notification of the account number to the Project Director and the appropriate Dean. The VP for Development will also receive notification of the G/L account number, so that an AD code may be set up for the depositing of grant revenue.

C. Disbursements

1. Disbursement of grant funds is not permitted until account numbers have been established for recording grant activity in the books and records of the University. Every effort should be made to expedite forwarding the grant contract and budget documents to the Business Office.
2. Payroll is initiated by the approval of Position Request Form 5708. Payroll is processed in the normal course of university payroll accounting. All associated internal controls also apply to Grant Payroll.
3. Time and effort reports for each employee, detailing hours and projects worked on, should be maintained by the Project Director. Upon completion of the grant, all time and effort reports should be submitted to the Director of Accounting and Budgets. The Director of Accounting and Budgets will maintain the reports in accordance with the record retention and auditing requirements of the grant.
4. All other expenditures are initiated by the Project Director who has the authority to make purchases within the dollar constraints of the grant contract and budget amounts subject to normal University Purchasing limit guidelines.
5. Expenditures will be initiated by approved original vendor invoices, check request forms, travel expense forms or petty cash vouchers depending on the circumstances. Copies of supporting documentation for expenditures and photocopies of the above completed forms should be kept on file by the Project Director and compared to the monthly department budget report.

6. Payments will be processed by the Business Office in the normal course of operations and all internal controls over every day disbursements will apply to grant-related expenditures.
7. The Project Director and the appropriate Dean may access their monthly departmental budget report/income statement by grant from the on-line budget system or may request a paper copy. The appropriate Dean should on a monthly basis track cumulative expenditures by category (payroll, materials, etc.) in order to assure that constraints contained in the grant contract and University budget are not violated. Copies of the monthly budget reports/income statements should be kept on file for use in preparing quarterly reports/invoices.

D. Grant Revenue

1. All payments from grant funds that are received should be forwarded to the Development Office. The Development Office is responsible for depositing the funds to the designated grant account.
2. The Project Director is responsible for initiating fund requests. Funding requests, in the form of payment invoices or requests for reimbursements, should be supported by the monthly department budget reports and approved by the appropriate Dean. The VP for Development will assist the Project Director in the preparation of payment invoices or requests for reimbursement. Any invoices or requests for reimbursements should be signed by the Comptroller or VP for Business Affairs before they are submitted to the funding agency.
3. Cash receipts (funds) under grant contracts are processed in conjunction with all other University receipts. All internal controls over the cash receipts process apply to the grant proceeds as well.
4. The Project Director is also responsible for monitoring the receipt of matching funds as identified in the grant application package. The appropriate Dean should track progress in receiving these funds. The funds received will be processed with other University grant funds, through the Development Office, and all internal controls thereon will also apply to receipt of matching funds from external sources. Matching funds along with supporting documentation should be forwarded promptly to the Development Office.

E. Grant Reports

1. Grant reporting requirements vary depending upon the granting agency. The Project Director is responsible for preparing all reports as required by the grant. The Project Director will be responsible for submitting all narrative reports that are required by the funding agency. The Project Director will work with the Director of Accounting and Budgets in the preparation of all financial reports that are required. The financial reports should be approved by the appropriate Dean as well as the Comptroller or VP for Business Affairs.
2. Upon completion of the grant contract or closure of the grant, the Project Director should give written notification of the closing to the appropriate Dean, the VP for Development, the Provost or appropriate VP, the VP for Business Affairs and the Director of Accounting and Budgets. All appropriate reports and records of the grant should be forwarded to the Director of Accounting and Budgets. The Director of Accounting and Budgets will maintain the file in accordance with the grant record retention policy and audit requirements.