OMB Circular A-110 basics

http://www.whitehouse.gov/omb/circulars/a110/a110.html

Post-award Education Program

A-110 TOPICS

- Cost Sharing. This is the portion of project costs not borne by the Federal Government. It represents institutional committment to the project. Cost sharing can be mandatory or voluntary, committed or uncommitted. Examples include cash, academic year effort, or third-party contributions.
- Program Income. This term applies to funds earned during a project period. Program income can include products or materials purchased on an award and sold after research is conducted, or the sale of information produced or acquired under the award.
- Property Management. Regulations apply to property purchased under Federal awards, such as land, structures or equipment. Property management may also apply to supplies. A physical inventory must be performed every two years, and property must be safeguarded against damage, loss, and theft. Intellectual property is governed by the provisions of Bayh-Dole.
- Reports and Records. A-110 sets forth procedures for monitoring and reporting financial and program performance and the required reporting forms, including requirements for record retention. Award recipients are responsible for managing and monitoring each project, program, function and activity supported by an award. Award recipients are also responsible for ensuring that any and all subrecipients have met applicable audit requirements.
- Close-Out Requirements.
  - -All reports (scientific and financial) submitted within 90 days
  - -All obligations liquidated within 90 days
  - -Prompt payment by awarding agency
  - -Recipient refund of unobligated cash advances
  - -Accounting for real and personal property
  - -Agency right to recover disallowances

Uniform Administrative Requirements for Grants & Agreements

"This Circular sets forth standards for obtaining consistency and uniformity among Federal agencies in the administration of grants to and agreements with institutions of higher education, hospitals, and other non-profit organizations."

Reporting Requirements

A-110 sets forth procedures for monitoring and reporting financial and program performance and the required reporting forms, including requirements for record retention. Award recipients are responsible for managing and monitoring each project, program, function and activity supported by an award. Award recipients are also responsible for ensuring that any and all subrecipients have met applicable audit requirements.

Reports must be completed not more than quarterly and not less than annually. Reports must contain the following:

- Comparison of actual accomplishments with set goals for the reporting period
- If applicable, reasons goals were not met
- Explanations for any cost over-runs or high unit costs

Award recipients must notify the awarding agency whenever events occur that have a significant impact on the project or program, or when problems, delays, or adverse conditions materially impair the ability to attain program objectives. The agency must be notified whenever the scope of the project changes.

A Financial Status Report (FSR), such as SF-269, is required at the completion of any federally sponsored project. At OHSU, this final report is prepared in Sponsored Projects Administration (SPA), with supporting documentation provided by the department. Final scientific reports are the responsibility of the Principal Investigator. Departments should notify SPA once the final scientific report has been submitted to the sponsor.

Record Retention Requirements

According to A-110, financial records, supporting documents, statistical records and all other records must be retained for three years from the date of final report, except when:

- Litigation requires retention until matters have been resolved
- Records are transferred to the agency, in which case retention requirements end
- Other requirements apply (eg, state or university requirements)

With agency approval, copies may be substituted for originals. Electronic copies are acceptible, provided the institution has established appropriate procedures.

Program Income

An award recipient has no responsibility to the awarding agency for income earned after the completion of the project period unless the agency's regulations or Terms and Conditions specify otherwise.

Program income received during an active project may be handled in one of the following ways:

- Added to funds committed to the project
- Deducted from total project allowable costs
- Applied to the non-federal share of project costs
- Delivered to the sponsoring agency

Questions about program income should be directed to Sponsored Projects Administration.