



Boston College: OFFICE FOR SPONSORED PROGRAMS Reporting Policy

Background

The Boston College Office for Sponsored Programs provides administration and support for sponsored programs. Sponsored programs, or the term sponsored awards, may be used in this document interchangeably and mean any agreement, contract, or grant that is funded by a source other than Boston College. Activities related to sponsored programs must comply with Boston College's policies and procedures, the sponsor's terms and conditions, and Federal regulations. Federal regulations include the [Code of Federal Register \(CFR\) Vol. 78 No. 248](#) issued December 26, 2013, and [Vol. 79 No. 244 issued December 19, 2014](#), also known as the Uniform Guidance and which contains the requirements set forth by the Office of Management and Budget (OMB) and the implementation plans of Federal agencies. The effective date for most parts of the Uniform Guidance is on or after December 26, 2014.

Purpose

The purpose of this policy is to provide guidelines and requirements for sponsored awards at Boston College so that sponsors will be provided timely, accurate, and complete information for interim and final reports.

Scope

This policy is applicable to all sponsored awards and must be followed by schools, departments, centers, institutes, and personnel of Boston College involved with sponsored awards.

Effective Date

The effective date of this policy is December 26, 2014.

Definitions

Allowable Costs are charges for goods or services that are permitted on a sponsored award, agreement, contract, or grant. In other words, these costs are in compliance with Boston College's policies and procedures, the sponsor's terms and conditions, and Federal regulations, and therefore the allowable costs may be paid from the sponsor's funds. Allowability also includes the concepts that costs must be: (a) necessary and reasonable for performance of the sponsored award; allocable to the sponsored award; (b) in compliance with the sponsor's terms and conditions; (c) consistent with policies and procedures that apply uniformly to both Federally-financed and other activities at Boston College; (d) accorded consistent treatment (for example, a cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost; (e) in accordance with generally accepted accounting principles (GAAP); (f) only charged

once (for example, the cost must not be included as a cost or used to meet cost sharing or matching requirements of any other Federally-financed program in either the current or a prior period.

Allocable Costs: A cost is allocable to a particular award if the goods or services [the costs] involved are chargeable or assignable to that award in accordance with relative benefits received. This standard is met if the cost: 1) is incurred specifically for the award, 2) benefits both the award and other work of Boston College and can be distributed in proportions that may be approximated using reasonable methods; and 3) is necessary to the overall operation of Boston College and is assignable in part to the award. See also OSP website for [Cost Allocation Methodologies Guide](#).

Direct Costs are those costs that can be identified specifically with a particular final cost objective, such as a Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect (F&A) costs.

Indirect Costs / Facilities & Administrative Costs (F&A) are costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. “Facilities” is defined as depreciation on buildings, equipment and capital improvement, interest on debt associated with certain buildings, equipment and capital improvements, and operations and maintenance expenses. “Administration” is defined as general administration and general expenses such as accounting, personnel and all other types of expenditures not listed specifically under one of the subcategories of “Facilities.”

Overdraft/ Cost Overruns are charges that exceed the sponsor’s funding amount. These costs should be removed from the sponsored award and charged to a non-sponsored chart string via a cost transfer; see OSP [Cost Transfer Policy](#).

Reasonable Costs: A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. Consideration must be given to: (a) whether the cost is generally recognized as ordinary and necessary for the proper and efficient performance of the award, (b) sound business practices, arm’s-length bargaining, Federal, State, and other laws and regulations, and terms and conditions of the award, (c) market prices for comparable goods or services for the geographic area, (d) whether the individuals concerned acted with prudence in the circumstances, and (e) whether Boston College deviates from its established practices and policies regarding the incurrence of the costs.

Sponsored awards, or the term sponsored programs, may be used in this document interchangeably and mean any agreement, contract, or grant that is funded by a source other than Boston College.

Unallowable Costs are expenditures on sponsored award that are not in compliance with Boston College policy, Federal regulations, or specific sponsor terms and conditions. Costs that are deemed unallowable must be removed from the sponsored award via a cost transfer; see [OSP Cost Transfer Policy](#).

Policy Details / Procedures

It is the policy of Boston College that all costs charged to a sponsored program must comply with Boston College's policies and procedures, the sponsor's terms and conditions, and Federal regulations. All costs charged to sponsored awards must be: allowable, allocable, and reasonable. The reporting requirements below are general practices, and each award's terms and conditions will dictate the specifics necessary to meet sponsor requirements for reporting.

Financial Reporting

The Office of Sponsored Programs (OSP) is responsible for generating various financial reports for end users. The end users include sponsors, Principal Investigators (PI's) and Departmental Research Administrators (DRA's). OSP runs a query from the Grants Module in the PeopleSoft system on a monthly basis which lists all of the financial reporting requirements due that month.

All financial reporting to sponsors is based upon expenditures charged to the project according to the Boston College's accounting system. While most sponsor financial reporting requirements can be satisfied by reporting forms alone, it may, on occasion, be necessary to obtain supplemental information for some projects. These requirements necessitate close collaboration among the Office for Sponsored Programs, the Principal Investigator, and Department Research Administrators.

The Office for Sponsored Programs prepares all required financial reports, and final invoices. In order to ensure that the reported expenditures include all appropriate charges and exclude unallowable charges, OSP will be in communication with the PI and DRA prior to submitting the final report.

The basis for the financial reporting is the "Budgeted/Accounted Comparison Report for Grants" (ACR) which is generated and placed on the VISTA system monthly. ACR's are sent to VISTA for monthly review by PI's. The ACR displays the financial status of a grant at a specific point in time (usually month end). The ACR is run from Project Resources, which shows the budgeted and expended summary data with the remaining balance available. An ACR may also be run by OSP staff on an ad hoc basis, as needed. DRA's have and PI's (upon request) access to the Grant Balance Summary Report, which is an ad hoc report that is run from Commitment Control. The Grant Balance Summary Report displays the available balance.

The ACR provides OSP with the information necessary to report the financial status to award sponsors. Support for the ACR is delivered in the form of a "Transaction Detail Report for Grants" (TDR), another PeopleSoft Grants report. This report provides the detailed transactions

associated with a grant for a specified period of time, usually a particular month. The TDR is generated to VISTA monthly. A TDR may also be run by OSP staff on an ad hoc basis, as needed.

PI's can also review the TDR Report which contains individual transactional detail for the budget transfers, requisitions, purchase orders, vouchers, expense reports, salary encumbrances, salary actuals, and journal entries for standard charges (P-Card, Pitney Bowes, BC Bureau Of Conferences) and allocations (Fringe Benefits and F&A). OSP Post-Award team reviews all expenditures (except for vouchers, expense reports, and requisitions under \$1,000 and all Procurement Card transactions) for allowability prior to approval of all purchases. Procurement Card (P-Card) transactions of \$1,000 or greater are reviewed after the fact.

The ACRs and TDRs are generated from data maintained in the Project Resource Table. The grant expenditure data maintained in Proj_resources is reconciled on a monthly basis with the expenditure data recorded in the General Ledger. PI's and Departmental Research Administrators are only able to view the ACRs or TDRs related to their grants through VISTA. The access is controlled by a combination of VISTA security maintained by Financial Management Systems (FMS) and Project Team Security maintained by OSP.

Monthly or quarterly invoicing required by sponsors to obtain reimbursement or cash advances is done by the Office for Sponsored Programs. OSP Post-Award team monitors cash balances using the aging reports from the PeopleSoft Billing/AR system which lists by grant/account all cash balances. If positive cash balances exist (rare as the vast majority of Boston College's grants are on a reimbursement basis) the amount is refunded to the agency or written-off if the award is fixed price or if the sponsor approves Boston College retaining the remaining balance at the end of the award period. See also OSP [Cash Management Policy](#).

Prior to the PeopleSoft Upgrade OSP reviewed all changes to budgeted amounts, including realignments and expansions. Since the upgrade to PeopleSoft 9.1 which went into effect March 25, 2014, DRA's are now allowed to transfer funds under \$2,000 between certain low-risk accounts without OSP approval. See further details in the OSP [Allowable and Unallowable Costs Policy](#) regarding the Budget Transfers section.

A system generated notice is sent to PI's indicating when 90 days in a grant period remain (see also OSP Closeout Policy). Federal regulations indicate that all expenses must be submitted within 90 days after the award period ends. OSP Post-Award team then reviews the budget and encumbrances to ensure that the project will be completed on budget. OSP encourages the PI's to submit expenses as soon as possible. Any expense over the grant amount has to be covered by the related department; see see OSP [Cost Transfer Policy](#) regarding overdraft/cost overruns.

Federal Awards: As stated in the Uniform Guidance § 200.327 Financial Reporting, "Unless otherwise approved by OMB, the Federal awarding agency may solicit only the standard, OMB-approved government-wide data elements for collection of financial information (at time of publication the Federal Financial Report or such future collections as may be approved by OMB and listed on the OMB web site). This information must be collected with the frequency

required by the terms and conditions of the Federal award, but no less frequently than annually nor more frequently than quarterly except in unusual circumstances, for example where more frequent reporting is necessary for the effective monitoring of the Federal award or could significantly affect program outcomes, and preferably in coordination with performance reporting.”

The Uniform Guidance’s preamble noted one of the pinnacle objectives of the Uniform Guidance is to reduce the risk of waste, fraud, and abuse. In order to better mitigate risks of waste, fraud, and abuse, required certification language was strengthened to include specific language acknowledging the statutory consequences of false certifications.

§ 200.415 Required Certifications.

Required certifications include: (a) To assure that expenditures are proper and in accordance with the terms and conditions of the Federal award and approved project budgets, the annual and final fiscal reports or vouchers requesting payment under the agreements **must** include a certification, signed by an official who is authorized to legally bind the non-Federal entity, which reads as follows: “By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729–3730 and 3801–3812).”

Individuals within OSP have been designated as authorized to legally bind / certify on behalf of Boston College.

Federal Awards: Boston College **must** use standard, OMB-approved data elements for collection of performance information (including performance progress reports, Research Performance Progress Report, or such future collections as may be approved by OMB and listed on the OMB web site), as noted in Uniform Guidance § 200.328 Monitoring and Reporting Program Performance.

Boston College is responsible for oversight of the operations of Federal award supported activities. Boston College **must** monitor its activities under Federal awards to assure compliance with applicable Federal requirements and ensure performance expectations are being achieved. Monitoring by Boston College **must** cover each program, function, or activity. It **must** also include the requirements for pass-through entities per Uniform Guidance § 200.331.

Contacts

If you have any questions about this policy, how to treat a specific cost, or need additional information, please contact the Office for Sponsored Programs main number at 617-552-3344 or directly contact your area’s OSP Liaison ([OSP Staff](#)).