Module 3 Summary:

• Fiscal management of awards is a joint responsibility assumed by Northeastern University as the grantee, the Principal Investigator(s), as well as others including Research Administration, Research Finance, the College Grant Administrator(s) and Compliance.

• Fiscal management oversight requires us to understand and apply principles, policies and regulations encompassing several areas, including:
  – Personnel
  – Allowable Costs
  – Cost Sharing/Under recovery of F&A
  – Cost Transfers
  – Audits

• When charging a cost to an award, make sure the costs are:
  – Allocable,
  – Necessary and Reasonable, AND
  – Treated consistently and conform to the Terms and Conditions of the award

• Northeastern University is responsible for and has procedures to make sure that all capital equipment is properly acquired, classified, safeguarded, depreciated, disposed, scrapped or sold

• Expenses against the grant must be current and should be reviewed and reconciled each month by the department and PI.
  – Northeastern University is required to retain sufficient documentation in the event of an audit
  – The NSF Compliance Agreement requires that Northeastern University hire an independent auditor to conduct an annual NSF-specific audit.

• Effort that has actually been completed must be certified as a condition of the award.

• Closeout officially ends the award relationship; the closeout process is complete when the awarding agency has received all required reports.

• Throughout the project, there are many resources to assist you in understanding your responsibilities and help you navigate the applicable regulations.

Resources:

I. **NSF Policies and Regulations:**
   • [NSF Proposal and Award Policies and Procedures Guide (PAPPG) Proposal Preparation instructions](#)

II. **Other Government Policies and Regulations:**
   • OMB Guidance on Compensation for Personal Services §[CFR 200.430](#)
   • Uniform Guidance Cost Principles, CFR §200, Subpart E
   • OMB Guidance on Required Certifications CFR §200.415(a)
   • OMB Guidance on Direct Costs CFR §200.413
III. Northeastern University Institutional Policies and Procedures

- Policy on Costs for Sponsored Agreements
- Policy on Cost Sharing
- Policy on Use of University Funds
- Policy on Effort Reporting
- Policy on Travel and Expense Reimbursement
- Policy on Cost Transfer
- Policy on Asset Disposition
- Policy on Research Grant Closeout Balance
- Procedure on Subrecipient Monitoring

IV. Other Northeastern University Resources:

- Allowable Cost Guidelines
- F&A Rate
- University Prior Approval Form (UPAF)
- Gatekeepers
- Procurement
- Payroll Distribution Change (PDC) form and related procedure
- Journal Voucher
- Grant Closeout Process
- Whistleblower Policy
- Northeastern Compliance Hotline
- NSF Compliance Officer
- The NSF Fraud Hotline at:
  - Telephone: 800-428-2189
  - Website: http://www.nsf.gov/oig/report-fraud/
- NSF Fraud Hotline Poster
- The Office of the Inspector General at:
  - Email: OIG@NSF.GOV

For more information, contact the Office of Research Administration and Finance

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