

San Francisco State University

Grant Administration Infrastructure Change

Action Plan

Section II

Based on recommendations provided to SFSU by Huron Consulting, 2006. As the campus implements change in its research infrastructure, new versions of the Action Plan will unfold, containing more evolved action items and different elaborations on some of the topics included in this document.

This document contains two sections:

1. Organizational and Structural Changes
2. Changes in Business and Administrative Procedures

Draft 1
August 22, 2006

Table of contents

Section II	3
Executive Summary:	4
Action Items	4
Procedure Implementation	6
Action Plan Items	8
10. Subrecipient Monitoring	8
28. Monitor subrecipients for work performed on grants and for A-133 compliance.	8
11. Cost Transfers	9
<i>Cost Transfers (General)</i>	9
<i>Cost Transfers (Personnel)</i>	10
<i>Cost Transfers (Non-Personnel)</i>	11
12. Closeout	12
13. Financial Reporting	14
14. Residual Funds	15
15. Proposal Development	16
16. Identification of Funding Sources	20
17. Cost Share	21
18. Accounts Receivable	22
19. Cash Management	23
20. Electronic Draw of Federal Funds (LOC / ASAP / EGrant)	24
21. Internal Controls	26
22. Meals and Entertainment Expenses	27
23. Online Purchasing/P Cards	28
24. Personnel	29
<i>General</i>	29
<i>Payroll for Students, Hourly and Salaried Positions</i>	31
<i>Payroll for Faculty</i>	31
25. Stipends and Tuition Reimbursement	33
26. Travel	34
27. Budget Revisions	35
28. Conflict of Interest	36
29. Subcontracts (execution and approval)	37
30. Human and Animal Subjects; Biosafety; and other Committee	
Approvals/Renewals	38
31. Award Acceptance and Negotiation	39
32. Intellectual Property Identification	40
33. Effort Reporting	41
34. Award Set-up	42
35. Records Retention	43
36. Financial and Management Reporting	44
37. Invoicing:	46

38.	Direct and Indirect Charging	47
39.	Procedure Documents	48
40.	Technology	49
41.	Training	52
42.	Roles and Responsibilities	53
43.	Communication	54
44.	Website.....	55

Section II

Changes in Business and Administrative Procedures

Executive Summary:

Action Items

This document includes approximately 100 action items. The full list of action items is contained within the body of the report and is grouped by each of the 27 procedures reviewed during the Huron project.

Critical action items:

1. Complete the commitments listed in the *Improvements in the Research Administration Compliance* report submitted to the National Science Foundation including:
 - a. Complete all prior period Effort Reports through the Winter FY05 period.
 - b. Create a multi-level, ongoing review to ensure reasonableness, allowability, and allocability of all research related costs.
 - c. Improve internal audit procedures to provide research administration oversight.
 - d. Improve grants management technology to enable accurate financial reporting, effort reporting, and monitoring of cost sharing commitments.
 - e. Implement a comprehensive subrecipient monitoring procedure.
2. Complete A-133 subrecipient monitoring certifications.
3. Implement a consistent procedure to ensure SFSU completes effort reports on a timely basis.
4. Replace the Reimbursed Release Time (RRT) process with a distribution method, such as Job Earnings Distribution (JED), for charging faculty academic semester salaries to sponsored projects. See action item 15k, pages 21-22.
5. Track all cost sharing using a “companion account.” See action item 8b, page 16.
6. Initiate a sponsored projects administration education program for central staff, department staff and PIs. See other action items 32a – 32b, page 33.
7. Reduce the number cost transfers (both salary and non-salary), especially those processed more than 90 days after the original expense is charged to a project. See the cost transfer action items, 2 a – h, pages 7-9.
8. Reduce the number of sponsored research accounts with balances open past the award’s end date. SFSU has approximately 500 accounts (+/- 100) that have a combined \$2M deficit. These open accounts present both compliance and financial risk to SFSU. Transfer deficit balances not resulting from an error by central administration (e.g., ORSP, Fiscal Affairs, etc.) to a PI’s unit. See action items 3a, page 9, and 5c, page 11.
9. Reduce the time required to prepare the Letter-of-Credit (LOC) draw by using a query in PeopleSoft that identifies federal awards that are billed using an electronic

- payment mechanism. See action item 11a, page 17.
10. Increase the frequency of the LOC draw from quarterly to monthly. See recommendation 11c, page 17-18.
 11. Limit cost sharing to situations where it is required by the sponsor or related to strategic university initiatives. See action item 8a, page 15-16.
 12. Develop a committee to address the management reporting needs to the SFSU research community. See action items 31a, page 30-31.
 13. Monitor the financial and management reports and communicate the outcomes in a meaningful way to SFSU leadership. See action item 27c, page 28-29.
 14. Charge travel advances to the PI's unit. See action item 17a, page 22-23.
 15. Populate the attribute screens in PeopleSoft GL with invoicing, financial reporting, and other project specific information. This will eliminate the need for "shadow systems" to capture this information. See action items 4b - page 10, 11a - page 17, 21b - page 24, 25c - page 26, 28a - page 29, 29b, 31a, 31b, 31c, pages 30-32.
 16. Review how revenue is booked for projects paid by electronic payment (e.g., Letter of Credit) verses projects that are invoiced. Ensure consistency with the SFSU Disclosure Statement (DS-2).
 17. Consider negotiating a Fringe Benefit rate as part of the next Facilities and Administrative (F&A) rate agreement.
 18. Review how faculty are paid for the Fall and Spring academic semesters. Determine the feasibility of all Fall Semester payments being consecutive. The current pay schedule has a 6 month gap between the fifth and sixth payment. Example starting on 9/1/05: Fall – 9/05, 10/05, 11/05, 12/05, 1/06, 8/06 Spring – 2/06, 3/06, 4/06, 5/06, 6/06, 7/06.

Procedure Implementation

It is important to recognize that this assessment is the first step in what should be an ongoing and iterative process to improve sponsored project administration at SFSU. Successful implementation of the action items contained in this report will be dependent on many diverse factors including, investments in personnel, new technologies and a cultural evolution that enables the central and academic units to work as partners to achieve performance objectives. Extensive coordination will be required to ensure the implementation efforts meet the “end user” needs. Huron recommends that the implementation plan:

1. Establish a Steering Committee authorized by the President to oversee procedure implementation.

It is critical that senior SFSU leadership drive the procedure implementation. This includes developing an implementation strategy (see below), setting deadlines, and reviewing the implementation progress. This committee should report progress to a Senior Management team every two weeks.

2. Use the Executive Summary of this document to prioritize implementation.

Action items included in the executive summary should receive the highest priority when developing the implementation plan.

3. Include faculty participation and input.

Faculty involvement will be critical to successful procedure implementation. In addition to faculty participation in the process, it will be important to provide communication to the faculty throughout the process. When possible, changes derived from faculty input/feedback should be highlighted. These may include developing a report that will provide a financial “snapshot” for projects, online resources (such as templates), etc.

4. Develop a communication and training strategy for central administrators, department staff, and faculty.

As part of the implementation of the procedure recommendations a significant amount of training and communication will be necessary. When developing the procedure implementation plan it will be important to determine the most effective methods of disseminating information. Consider the following steps:

- a. Post external procedures on the ORSP website
- b. Post both external and internal procedures on a network drive or secure website with shared access (ORSP, Fiscal Affairs, Budget Office, Human Resources)
- c. Communicate and train central and department staff on changes and implementation strategy (how changes will be rolled out to research community)

- d. Communicate and train faculty on changes
- e. Develop ongoing training for central administrators, department staff, and faculty (see action items 32a – b, page 33.

Action Plan Items

10. Subrecipient Monitoring

28. Monitor subrecipients for work performed on grants and for A-133 compliance.

1. Verify that subrecipients have complied with A-133 requirements (see Subrecipient A-133 Internal Procedure document). Consider the following action items:
2. Develop a template letter, the A-133 Audit Compliance Certification Form, for annual distribution to subrecipients.
3. Develop a database to assist with tracking the A-133 audit requirements of subrecipients.
4. Review SFSU subcontract template to determine if the correct information is included as outlined in the A-133 requirements:
 - Identify Federal awards for each subrecipient. Include the CFDA title and number, award name and number, award year, if the award is R&D, and name of Federal sponsoring agency.
 - Advise subrecipients of requirements imposed on them by Federal laws, regulations, and the provisions of contracts or grant agreements as well as any supplemental requirements imposed by the pass-through entity.
 - Require each subrecipient to permit the pass-through entity and auditors to have access to the records and financial statements as necessary for the pass-through entity to comply with this part.

29. Streamline the Subrecipient Invoice Review Process.

Make the following workflow improvements to reduce hand-offs and increase efficiency:

1. The Grant Support Coordinator should distribute the invoice directly to the individual with the correct signatory authority for final review, as this will reduce the number of hand-offs.
2. Revise the SFSU subcontract template to have all invoices sent directly to the Grant Support Coordinator instead of the Grant Administrator to distribute to the appropriate signatory authority.

11. Cost Transfers

Cost Transfers (General)

30. Modify the cost transfer procedures to ensure a consistent process for all personnel and non-personnel cost transfers.

All cost transfers should be reviewed and approved by ORSP. When problems are resolved and the appropriate back-up documentation is obtained, ORSP will forward the cost transfer to Fiscal Affairs, or ORSP Personnel for processing. This will create consistency when reviewing the transfers. In addition if a cost transfer has not been approved by ORSP, Fiscal Affairs should not process the transfer.

31. Develop a standard cost transfer request form submitted through the ORSP website that a PI can use to request both personnel and non-personnel cost transfers (currently the forms are different).

Personnel and non-personnel cost transfers are currently processed using different forms. Personnel cost transfers use the Labor Cost Distribution (LCD) form and non-personnel cost transfers use the SFSU Journal Entry/Adjustment Form. Huron has developed an example cost transfer form using the current Journal Entry/Adjustment Form as a basis that could be used for both salary and non-salary cost transfers (included as an attachment to the Recommended Cost Transfer procedure).

32. Route cost transfers electronically.

Use email to document PI and Department Chair (for cost transfers over 90 days from the date paid) approval for the cost transfer request and eliminate the delay created by mailing the form by campus mail to the PI for signature. (This requires developing an electronic signature policy and/or clearly stating this on the cost transfer request form).

33. Revise documentation required for cost transfers.

All cost transfers should have an explanation from the PI as to why the transfer is necessary. The PI should answer the following questions when completing the cost transfer request form via the ORSP website:

1. Why was the original expense charged to the original account?
2. Why should the expense be moved to the new account?
3. How does the expense benefit the project?

34. Obtain signature approval from a department chairperson for cost transfer requests more than 90 days after the expense was incurred.

The example cost transfer form developed by Huron as an attachment to the Recommended Cost Transfer Procedure includes an additional section that must be completed if the cost transfer is made more than 90 days after the original expense date. Late cost transfers should be processed on an exception basis and only when appropriate justification supports the adjustment. Cost transfers more than 90 days from the expense date should also have the signature and approval from the department chairperson, or equivalent.

35. Cost transfers submitted more than 45 days after an award has ended will not be processed.

PeopleSoft FMS posts transactions the following month from when a transaction is processed (uploaded). If cost transfers are not processed more than 45 days after the award terminates, this will give ORSP and Fiscal Affairs Accounting approximately 2 weeks to review, approve, and process the transfer so it can be reflected the following month when the final invoice or financial report is submitted to the sponsor. Therefore, cost transfers to move additional expenses to an award should be processed on an exception basis only. Cost transfers that reduce the expenses charged to a project should still be processed (this is necessary to avoid over billing the sponsor).

Cost Transfers (Personnel)

36. ORSP Personnel should process and upload the personnel cost transfers into the LCD screen in PeopleSoft HRMS.

There are currently seven hand-offs, many of which do not add significant value, before the personnel cost transfer is uploaded into PeopleSoft HRMS. To reduce the time needed to route and approve a personnel cost transfer, the number of hand offs should be reduced to a maximum of four. The ORSP Personnel Specialist should upload the cost transfer into the LCD screen in PeopleSoft HRMS once the PI, the Grant Administrator, and the ORSP Director have approved the transaction (consider delegating this review and signature to the Post-Award Manager). This will require ORSP Personnel to have production ability to upload personnel transactions into PeopleSoft HRMS.

37. Eliminate duplicative data entry when processing a personnel cost transfer.

Enter cost transfer information into a single database (PeopleSoft). Currently, ORSP inputs information from personnel cost transfers into the Document Management System (DMS) and FileMaker Pro. Duplicative information is entered into PeopleSoft by the Budget Office when the personnel cost transfer form is uploaded to PeopleSoft HRMS. It is not necessary for ORSP to enter cost transfer information into DMS and FileMaker Pro as a hard copy of the

form and the PeopleSoft transaction record is sufficient.

Cost Transfers (Non-Personnel)

38. No Recommendations. Pending ORSP-FA analysis

12. Closeout

39. Reduce the number of open awards that are past their termination date.

ORSP and Fiscal Affairs should make it a priority to reduce the number of sponsored projects that are open past the award's termination deadline. ORSP and Fiscal Affairs are currently conducting meetings to reconcile and close the awards and should continue working towards their goal. Consider creating a project team and set goals to make certain measured progress is made to reduce the number of open and un-reconciled accounts.

Additionally, implement management reports to provide information on the timeliness of award closeouts. See the Financial and Management Reporting section of this document for example reports.

40. Implement a specific timeline for the closeout process that states when steps should be completed. For example, a letter should be sent to the PI 60 to 90 days before the end of the award to notify the PI that the project is scheduled to end.

Starting the communication prior to the end date of the award (PI notification letter) and following a timeline will help to identify potential problems that need to be resolved prior to closeout and minimize the last minute adjustments that occur at the end of an award (e.g., liquidation of encumbrances, etc.). The timeline should include all the steps that need to be completed before an account can be closed in the SFSU financial system: expenses must be verified and reconciled, financial reports must be submitted, final invoices sent, payment received, and cash applied. A timeline has been incorporated into the recommended closeout procedure. A template PI Notification Letter is also included as an attachment to the recommended closeout procedure.

41. Develop an “on-hold” status in PeopleSoft that restricts expenses from posting to sponsored projects, but will allow cash/revenue to post.

Work with Information Technology to develop an “on-hold” status that allows cash/revenue to post to an award, but will block additional expenses from posting. After a project is put “on-hold”, additional payroll expenses are charged to a “suspense account” (this has recently been created by SFSU) and non-payroll charges will be prevented.

42. Fiscal Affairs should place the project “on-hold” after completing the final financial report.

Fiscal Affairs should switch the project from “active” to “on-hold” when the final financial report is submitted.

43. Fiscal Affairs should inactivate (change the status from “on-hold” to “inactive”) in PeopleSoft after the final cash payment is received.

When the final financial report is filed and any outstanding receivables have been collected (Cash = Revenue = Expenses = Final Financial Report) Fiscal Affairs should inactivate the project in PeopleSoft. If necessary, and only on an exception basis, Fiscal Affairs may consider activating a closed project and revising the final financial report. The Controller and/or the AVP of Fiscal Affairs should make this decision before a project is reactivated.

13. Financial Reporting

44. Provide PIs and ORSP an opportunity to review the final financial report before it is submitted to the sponsor.

The Fiscal Affairs Accountant should send the PI and the ORSP Grant Administrator the final financial report prior to submitting it to the sponsor. This communication should take place via email and the PI and ORSP Grant Administrator should respond to the email within 5 days if there are concerns with the reported amount. Include in the communication that if a response is not received within 5 days, the financial report will be filed.

45. Use PeopleSoft to track financial report due dates.

Use PeopleSoft to track financial report due dates instead of MS Excel spreadsheets. The PeopleSoft Award Attributes screen can be populated to generate queries that track the financial report due dates. This will require completing a data conversion of the financial report due dates entered in the MS Excel spreadsheet currently used.

14. Residual Funds

46. Transfer residual fund credit balances to a PI's unit.

Residual credit balances that do not need to be returned to the sponsor should be transferred to the PI's unit (department level) so the project can be inactivated in PeopleSoft. The final total expenditures showing on a project (after transferring any credit or deficit balances) must equal the expenditures reported on the final report to the sponsoring agency. Residual credit balances that are not returned to the sponsor are currently left in the project account for the PI to use. Leaving the account open creates a risk that more expenses will be charged that exceed the residual balance, or an account will remain open in perpetuity. Additionally, it may be difficult to determine which expenses were project related.

47. Retain the F&A on the residual funds.

When transferring residual funds to a PI's unit account, ORSP should retain the F&A costs on the residual funds. (For example, if \$10,000 in residual funds remain at the conclusion of an award and the F&A rate for the sponsored project is 25%, transfer \$8,000 to the department and retain \$2,000.)

48. Transfer deficit balances not resulting from an error by central administration (e.g., ORSP, Fiscal Affairs, etc.) to a PI's unit.

At the end of a project, transfer any expenditures that are not able to be invoiced (e.g., expenses over the awarded amount, etc.) and/or payments that are not able to be collected due to outstanding technical information (e.g., the PI has not submitted a required report, etc.) to the PI's unit (department level). Errors due to central administration (e.g., ORSP, Fiscal Affairs, etc.) should be written-off by SFSU.

15. Proposal Development

49. Provide comprehensive salary information to ORSP Pre-Award.

Provide ORSP Pre-Award with direct access to salary information to complete proposal budgets.

Give a comprehensive list of salary information for faculty, research staff, and students who are associated with sponsored project activity on an annual basis or as salary levels are updated.

1. Provide documentation on the University's designated salary ranges for new positions.
2. Have ORSP Personnel provide comprehensive training on salary ranges for grant funded positions, classifying positions, and how the collective bargaining agreement impacts grant funded positions for ORSP Pre-Award.
3. Use ORSP Personnel as a resource to assist with unique personnel situations.

50. Provide faculty with a “checklist” document for proposal submissions.

Create a “checklist” document for each type of federal and non-federal submission which outlines who is responsible for the different sections of the proposal. Provide the “checklist” to the faculty during the proposal development process to clearly establish the sections of the proposal for which the PI is responsible. Example proposal checklists for competing awards (new), modular awards, and non-competing continuations are included as an attachment to the Proposal Development Procedure for SFSU review and implementation.

51. Adopt standard templates for routine Pre-Award correspondence.

ORSP should create templates for routine correspondence including standard award and subcontract cover letters, and email communication concerning approvals such as proposal routing, RRT and cost sharing. Correspondence templates can be saved on the “Gerry” shared drive where they can be easily accessed.

52. Provide PIs with a courtesy email on all proposal development email correspondence.

The Proposal Specialist should enhance the level of communication by courtesy copying the PI on all email correspondence concerning the proposal.

53. Improve the integration of the online PI Checklist Form.

Having a system where faculty input detailed information about their proposals online is a significant asset for SFSU and should be fully utilized.

1. Work within, or beyond, the technological limitations of the PI checklist form and redesign the interface so that data can be downloaded directly into the format most convenient for ORSP; DMS database, Proposal Template document, proposal routing form, a cost share form, or ideally all four.
2. Set up an automated email response for each PI checklist submission to save the Proposal Support Coordinator from manually responding to each PI checklist email.
3. Eliminate the Proposal Template Form because it contains the same information as the PI Checklist email but only in a slightly different format.

54. Add questions to the Online PI Checklist Form to identify potential exports or deemed exports that require additional review.

Include the following questions:

1. Will any foreign nationals be involved with this project?
2. Is there any information or equipment that will be shipped or taken outside the United States?
3. Will this project involve foreign travel?

If any of these questions are answered “yes”, the proposal should be reviewed by the Pre-Award Manager for exports or deemed exports that may require an export control license. Documentation that the review was completed should be included in the folder. Documentation should list whether any potential exports or deemed exports were identified. If an export or deemed export was identified, the documentation should also list whether the “fundamental research exclusion” applies or an Export License is required.

55. Establish one log to record proposal submissions.

Expand the DMS database to include fields for the unique information captured on the PI Checklist log and thereby eliminate the need to keep a separate ‘shadow system.’ In the short term have the Pre-Award Coordinator keep one electronic PI checklist log. A read only version of the electronic log can be kept in a public folder on the “Gerry” shared drive so anyone in the office can query the log, or print out a copy, as needed.

56. Generate monthly and annual reports on the proposal activity.

ORSP recently began accumulating quantifiable data concerning proposal submissions in DMS. Use this information in DMS to generate monthly reports and cumulative fiscal year reports. Organize the reports by the individual school and then distribute them to Deans, Department Chairs, and appropriate business offices. These reports provide tangible evidence of the level of

service provided to the university community by ORSP pre-award staff.

57. Redistribute the workload of Proposal Specialists.

ORSP should reorganize the distribution of proposals by designating core departments and SFSU Foundation/development proposals to individual Proposal Specialists. The Pre-Award Manager can then allocate proposals from less active departments to Proposal Specialists based on office workload at the time of the proposal submission. This should free up the Pre-Award Manager to focus on activities other than reviewing proposals. Additionally, this will provide a central point of contact for business units (such as the Romberg Tiburon Center) for questions. This will also facilitate the development of relationships with departments, which will improve customer service. When reorganizing the distribution of proposals:

1. Use historical proposal submission information to quantify the number of proposals from each department, PI, and type of proposal.
2. Qualify the different types of proposals to account for an average degree of difficulty for each type of proposal.
3. Account for peak proposal submission periods.
4. Develop a matrix that incorporates the quantitative and qualitative historical information and the peak submission periods to distribute the proposal workload amongst Proposal Specialists.
5. Pre-Award manager should reassess workloads every three months and reallocate assignments as necessary.

58. Use actual faculty salary and benefit information on proposal budgets.

All budgets submitted should use the actual salary and benefits for a faculty member and not the lecturer replacement rate. If there are not enough funds available in the proposed budget, the faculty member must document and obtain approval for the cost sharing of their salary.

59. Increase communications and outreach to the University Community.

ORSP Pre-Award should actively conduct more campus outreach.

1. Promote dialogue with faculty and department administrators to explain that ORSP resources are available to them.
2. Initiate formal and informal meetings with the University community to address issues, train faculty, and receive feedback concerning sponsored project management.
3. Utilize email to distribute periodic ORSP updates to faculty.
4. Promote discussion and strategies amongst faculty, (mentorship faculty review committees etc...) to improve the quality of proposals being

submitted.

60. Reformat the Proposal Routing Slip.

Incorporate the approval of the AVP of Fiscal Affairs or designee. (At one point, the Proposal Routing Slip had the AVP for Finance's signature but the current version does not.)

61. Standardize the review process for proposals.

1. PI signs the Proposal Routing Slip first.
2. Abstract, Budget and Budget Justification are then routed to the Department Chair for approval.
3. Abstract, Budget and Budget Justification are then routed to the Dean for approval.
4. Abstract, Budget and Budget Justification are then routed to the AVP of Fiscal Affairs for approval. (The AVP for Fiscal Affairs should consider designating signature authority for proposals to an individual who has the time and flexibility to accommodate last minute proposals.)
5. Entire Proposal is then routed to the AVP for Research for Approval.
6. Signatures, or electronic email signatures, must be received prior to submission.

61. Have ORSP process SFSU Foundation Proposals (those requiring a 501c3 status).

Have ORSP should submit all proposals for sponsored funding at SFSU. By reviewing and submitting all proposals through a central office, ORSP will provide a single point of contact for faculty. ORSP has staff dedicated to proposal review and will have more information related to institutional approvals and compliance requirements than the Foundation.

1. Incorporate Foundation proposals into ORSP
2. Include an additional step in the proposal development process to allow for the SFSU Foundation to review and approve the proposal.
3. Communicate to the faculty that all proposals should be submitted through ORSP.

16. Identification of Funding Sources

62. Encourage Faculty to use The Sponsored Programs Information Network (SPIN).

SPIN allows searches for funding opportunities based on very specific criteria. It is a powerful and user-friendly tool that is best utilized when faculty take ownership of their searches by creating their own search criteria and updating this criteria as necessary.

1. Create a basic training guide for SPIN and post it on the ORSP website.
2. Use email and schedule meetings at colleges and departments to highlight the SPIN system and distribute the training guide.

17. Cost Share

63. Limit cost sharing to situations where it is required by the sponsor or related to strategic university initiatives.

Only use cost sharing for strategic initiatives, when required by the sponsor, or when it will provide a competitive advantage (i.e., is included in the review criteria). This will maximize the financial impact of sponsored funding and reduce the number of cost share accounts (i.e., “2” accounts) that will need to be monitored and reported.

64. Set-up companion cost share account for all SFSU committed cost sharing.

Remove the distinction between how SFSU accounts for Voluntary “In-Kind” and “Mandatory” cost share and use the companion “2” accounts for all cost sharing. SFSU cost share commitments can be efficiently monitored and verified by ORSP in the companion “2” accounts. Also Labor Cost Sharing can be easily identified in a companion account and incorporated into SFSU’s effort reporting system.

65. Develop a companion cost share account to track cost sharing from subrecipients.

Create new business unit in PeopleSoft independent of the current units. Use a companion “3” account (or develop another naming convention) that will track subrecipient cost sharing. These accounts will be manually populated with a dollar amount based on cost sharing certified on invoices or other documentation received from subrecipients. These 3 accounts are to track subrecipient cost sharing only and will not be reflected on the SFSU General Ledger.

18. Accounts Receivable

66. Develop an Accounts Receivable Aging Report in the Accounts Receivable Module (ARM).

The current accounts receivable aging report is created manually using several reports generated in ARM and Brio. An Accounts Receivable Aging Report that can be run automatically from ARM will save considerable time, reduce the potential for errors, and be available on demand. The current aging report that is created manually should be used as a template to develop this report.

67. Fiscal Affairs should follow up by phone with invoices that are 75 days past due. Currently ORSP follows-up on outstanding invoices.

Fiscal Affairs should contact sponsors by phone with outstanding invoices starting 75 days after the invoice is sent (when the second past due letter is sent). Currently, past due letters are the only communication prior to invoices being 175 days past due. If the sponsor states that non-payment is due to an ORSP or PI related issue, the Grants Administrator in ORSP will be notified and follow-up as necessary.

19. Cash Management

68. No Recommendations. Pending ORSP-FA analysis

20. Electronic Draw of Federal Funds (LOC / ASAP / EGrant)

74. Create a customized query in PeopleSoft to identify federal awards that are billed using an electronic payment mechanism.

Create a query in PeopleSoft that will identify all federal awards and incorporate project attributes that will identify 1) if the award is billed electronically and 2) which type of payment mechanism is used (e.g. Letter of Credit, Automated Standard Application of Payment, or Egrant). The PeopleSoft Award Attributes screens can be configured to include this information to run queries from.

The report should also include:

1. Sponsoring Agency
2. Sponsor's Award Number
3. SFSU PeopleSoft Project Number
4. Date Range
5. Award Budget
6. Cumulative Expenses
7. Cumulative Revenue
8. Cumulative Cash

Use of this customized query to organize the Electronic Draw of federal funds will greatly reduce the time needed by the Fiscal Affairs Accountant to complete the draw.

70. Reconcile the electronic draw to the financial report only if an expense adjustment was made to the award that affected the expense balance since the last draw period.

Both the financial status report (Federal SF269) and the cash transactions report used for the Letter of Credit Draw (SF272) are populated from the same information in PeopleSoft FMS. Reconciling each award in the electronic draw list with its most recent financial report should only be necessary when total expenses decrease from the prior electronic draw and a final report has been filed, or if the sponsor requires approval of carry-forward and the expense adjustment impacts a previously reported period.

71. Increase the frequency of the LOC draw from quarterly to monthly.

Increasing the frequency of the LOC draw will reduce the average sponsored projects AR balance. This will also allow accounting reconciliations and project closeouts to be completed earlier.

72. Review the possibility of having payments for federally sponsored projects (e.g., NIH, NSF, etc.) sent directly to SFSU. Currently, payments are made to CSU central offices and a remittance must be completed by

SFSU to receive payment.

California state law requires all federal funds to be routed through State Fund 890. This change will likely require SFSU working with the Chancellor's Office for legislative change.

21. Internal Controls

73. Internal Audit should periodically monitor the Internal Control Procedures for sponsored projects administration.

Internal Audit should work with the offices responsible for sponsored project administration to assess the Internal Control Procedures and identify areas of potential compliance risk. Internal Audit should have access to all reports and financial information used by SFSU research administrators.

22. Meals and Entertainment Expenses

74. No Recommendations. Pending ORSP-FA analysis

23. Online Purchasing/P Cards

75. Establish a default unit account for sponsored project P-Cards.

Establish a non-sponsored default account at the unit level which will be automatically charged if a cardholder does not assign expenses to a sponsored project within the five business day grace period in the online P-Card system. Currently, expenses default to a sponsored project. The non-sponsored account (department account) should be identified on the form used to request a P-Card. Department Chair signature on this form should be used to provide approval for the use of the department account.

76. When a P-Card is cancelled, do not require the destroyed card be sent to ORSP on the Certification of Card Destruction Form.

Allow the Cardholder to destroy the P-Card and certify its destruction by sending the Certification of Card Destruction Form to ORSP. Do not require the cardholder to cut-up the card and affix it to the Certification of Card Destruction Form as additional proof.

24. Personnel

General

77. Modify the GL report to include detail of personnel expenses.

Detail of personnel expenses is necessary for the PI and ORSP to properly monitor the financial activity on a sponsored project. This detail will allow the PI and ORSP Post-Award to verify that the personnel activities on the report are accurate. The "Revenue and Expense" report should provide detail for personnel expenses similar to the detail currently being provided for fringe benefits.

78. Route PeopleSoft grant related ORSP (Department 3080) appointments through the ORSP Grants Administrator instead of the Fiscal Affairs Accountant.

Routing personnel expenses (ETRAC appointments for faculty, staff and students) through the Grants Administrator will create a consistent process for personnel and non-personnel expense review. Currently all non-personnel expenses are routed through the Grants Administrator.

79. Improve the functionality of PeopleSoft HRMS for ORSP Personnel.

Currently a significant portion of the ORSP Personnel workload is spent doing duplicate data entry. Information is entered into PeopleSoft and into a FileMaker shadow system to run reports that capture information specific to sponsored projects.

1. Create specialized queries in PeopleSoft HRMS that simulate reports being run out of the shadow system. Work with ORSP Personnel to obtain a comprehensive list of reports including:
 - i. Hourly time entry
 - ii. Absence reports
 - iii. Mailing Labels
 - iv. Reappointments
 - v. Effort Reporting
2. Increase the access in HRMS for ORSP Personnel to view and utilize information that is currently restricted to the Human Resource Office – Payroll, and the Budget Office.

80. Modify sponsored project GL reports to include encumbrances for personnel expenses.

Include encumbrances for salary and fringe based on the current pay rate and

the termination date associated with the HRMS appointment. This information will assist the PI, ORSP and Fiscal Affairs to manage budgets and forecast expenditures.

81. Allow email confirmations from faculty to hire grant funded positions.

Currently ORSP Personnel require a hard copy document with an approval signature to hire or reappoint an individual to a grant funded position. Emailed approvals in lieu of signatures are already accepted by ORSP Pre-Award during Proposal Development as a way to decrease the administrative burden on faculty and department staff. Additionally, the email approval is faster than sending approval through campus mail. Email approvals for personnel actions should reduce the time needed to process a personnel action, and free up ORSP Personnel Specialists from creating forms in a the FileMaker shadow system and tracking down faculty for signatures.

82. Initiate personnel actions at the time of award set up based on the award.

ORSP Personnel can work with the PI to set up personnel activities based on the award budget at the time of award set up. Proactively setting up personnel appointments should reduce the amount of time ORSP Personnel staff spend managing the stream of payroll appointments and personnel related items during the award, and greatly reduce the number of personnel related cost transfers.

83. Enhance PeopleSoft to incorporate date logic into appointment information.

Use end dates for sponsored project appointments in PeopleSoft to limit an appointment to its specified time period. Once the time period expires, salary charges will default to a suspense account or the PI's unit. This will assist ORSP Personnel and PIs to monitor personnel appointments and expenditures.

84. Redesign Reporting Process for Leave and Sick Time.

The monthly reporting process for leave and sick time on sponsored projects consumes a significant portion of the Personnel Specialist's time. Include leave and sick time in the hourly rate and that is charged to projects (based on the time report completed by the employee). The leave and sick time earned should be accumulated in an accrual account. When leave or sick is realized, the hours for leave and/or sick time will be charged as expenses to the accrual account. This will eliminate the need to reconcile leave and sick time for each project after the fact.

85. Include fringe benefit detail by individual in PeopleSoft.

Fringe benefit charges (except for faculty during the Spring and Fall academic

semesters) are charged in a lump sum by salary category (e.g., faculty, salaried staff, student, etc.) to each sponsored project. Fringe benefit detail by individual will provide more budgeting information for faculty and department staff.

Payroll for Students, Hourly and Salaried Positions

86. Investigate a method to eliminate dual appointments for students.

Currently if a student works more than 20 hours per week during academic months the student is paid as a student for 20 hours, and a “temporary bridge appointment” is created to pay for the student as an hourly employee for hours worked above 20. Students should not be working more than 20 hours per week, if they are to be considered students at SFSU. There should be only one appointment per month as either a student or hourly employee.

Payroll for Faculty

87. Replace the RRT system used to charge faculty salary to sponsored projects for the academic semesters.

Consider developing 1) an independent system that integrates with PeopleSoft, 2) modifying JED, and 3) other solutions. The solution should be designed to:

1. Incorporate faculty payments into the regular university payroll process
2. Streamline the appointment and payroll process on grants
3. Charge associated fringe benefits directly to a sponsored project
4. Eliminate the need for Reimbursed Release Time Transfers
5. Charge salary to sponsored projects during the period it is earned rather than the period it is paid (9 months verses 12 months)
6. Reduce the number of cost transfers

Independent System:

Develop a system to track faculty appointments for the academic semesters. Enter faculty appointment into the database at the beginning of each award. At the end of each period (9 periods) a salary expense will be charged to the sponsored project. Charge fringe benefits based on percent effort of individual and actual fringe benefits costs for each individual.

Modify the Job Earnings Distribution (JED) system:

Use JED to charge faculty salaries to sponsored projects during academic semesters. This would require:

1. Change in PeopleSoft ETRAC functionality / policy to permit JED entries with general fund account and sponsored project
2. Change in PeopleSoft HRMS functionality to allow ETRAC appointments solely for a change in funding source
3. Change in PeopleSoft HRMS to recognize ETRAC appointment termination dates.
4. Change in PeopleSoft HRMS security:
 - Allow ORSP access to faculty records not housed in department 3080.
 - Or allow departments use of 3080 accounts on the ETRAC.
 - Or redesign security access in PeopleSoft HRMS based on sponsored project account instead of department.
5. Adapt PeopleSoft HRMS and FMS to reconcile payroll expenses on sponsored projects during an academic year. University payroll is based on monthly payments on a calendar year basis ($1/12^{\text{th}}$). Expenses to a sponsored project during an academic year are based on $1/9^{\text{th}}$ of faculty salary base.

25. Stipends and Tuition Reimbursement

88. Make the Stipend Appointment Form clearer to limit potential confusion.

Change the 3rd question in box iii on the form to read "Is this stipend to assist in fulfilling an academic requirement?"

26. Travel

89. Charge travel advances to a PI's unit.

Do not charge travel advances to a sponsored project. If an advance is needed to pay for travel, the PI's unit should cover the advance. Any portion of the advance that was not used by the PI will need to be paid back to the department.

An option for allowing travel advances for PIs could be to follow a similar method currently used for travel advances charged between the General Fund and the Revolving Fund.

27. Budget Revisions

90. Establish a procedure for processing revised budgets at the Pre and Post-Award stages of a sponsored project.

Recommended Budget Revisions Procedure developed by Huron details whether ORSP Pre-Award or ORSP Post-Award is responsible for working with the PI to create and gain sponsor approval for a revised budget.

28. Conflict of Interest

91. Recertify Financial Conflict of Interest Disclosure on an annual basis.

In addition to the disclosure of Financial Conflict of Interest at the beginning of an award, SFSU should require recertification of the disclosure on an annual basis for the sponsored project. The recertification can be an email response from the PI confirming that there has not been a change in their disclosure status.

Consider having the annual recertification done in tandem with the annual financial disclosure required by the Office of Human Resources for non-sponsored activities at SFSU.

92. When a Conflict of Interest is disclosed, the AVP of Research and Sponsored Programs will work with the individual to address the conflict.

When a financial conflict of interest is identified, the AVP of Research and Sponsored Programs should work with the individual to develop an appropriate plan of action to address the conflict, and notify the sponsor of the disclosure.

93. Develop a training program for research faculty on SFSU Conflict of Interest policies and procedures.

Conduct Conflict of Interest training for research faculty annually. SFSU should consider developing a Conflict of Interest training available online, and incorporating Conflict of Interest training into larger and more general research related training sessions.

29. Subcontracts (execution and approval)

- 94. The Director of Procurement should negotiate all subcontracts received by SFSU. Currently this is a shared responsibility between the Director of Procurement and ORSP.**

The ORSP Grants Administrator currently negotiates the billing and reporting requirements, and the Director of Procurement negotiates all other items. The Director of Procurement should be the single point of contact to negotiate with the subcontract sponsor. If the Grants Administrator identifies unacceptable reporting and billing requirements, he or she will notify the Director of Procurement.

- 95. Review subrecipient credentials prior to issuing an agreement.**

Develop a process to review subrecipients prior to fully executing the subcontract. Such as: reviewing the Federal debarred and suspended list, reviewing the Duns & Bradstreet report, obtaining company background info of officers etc to check conflicts, etc.

- 96. Require A-133 information to be received from subrecipients before signing the agreement and executing the agreement.**

A request for A-133 information should be included with the subcontract agreement when it is sent to the subrecipient. Requiring A-133 certification to be received before executing a subcontract agreement will provide leverage to ensure that A-133 certification information is received.

30. Human and Animal Subjects; Biosafety; and other Committee Approvals/Renewals

97. Coordinate Protocol Approval Information between Office for the Protection of Human and Animal Subjects and ORSP.

Provide ORSP access to the approved / exempt protocol information kept by Office for the Protection of Human and Animal Subjects. Protocol information could be kept in a shared electronic file that ORSP can access during the award set-up process to confirm a protocol is current.

98. Match a protocol to its sponsored project in PeopleSoft.

Include the Protocol Number and expiration date in the attribute screen for each Sponsored Project in PeopleSoft. This reduces the reliance on separate systems to track human and animal subject protocols on sponsored Projects.

99. Update the Human and Animal Subjects Policy for the University.

The current initiative to update this policy should be completed timely to provide a resource and guideline to faculty and students developing protocol applications.

31. Award Acceptance and Negotiation

100. Require ORSP to review the terms and conditions of all new awards.

Have the Director of ORSP (or trained designee) complete a comprehensive review of the terms and conditions in the award document before the Director gives approval signature for the creation of a project account in PeopleSoft. Any terms and conditions or other requirements that are unfavorable should be identified and negotiated as appropriate. Unusual reporting and/or billing requirements should be identified for Fiscal Affairs.

32. Intellectual Property Identification

101. Formalize an Intellectual Property Policy for the University.

The AVP for Research and Sponsored Programs has created a comprehensive draft of an Intellectual Property Policy for SFSU. Priority should be given to review, revise, and approve this document so SFSU can institute a policy that can be used for negotiations on sponsored projects.

33. Effort Reporting

102. Monitor effort distribution and follow-up.

Effort reports should be distributed 30 days following the certification period and 100% of the effort reports should be certified and collected within 90 days.

103. Develop a policy that clearly defines SFSU institutional base salary.

It is important that the SFSU definition of institutional base salary is understood and documented. Additionally, the institutional base salary for sponsored project staff should be known by the appropriate administrative personnel. Examples of when this information is necessary include: calculation of effort reports, appointment set-up, calculation of proposal budgets, etc.

104. Consider implementing an online Effort Reporting system.

An online effort reporting system will reduce the time required to complete and distribute effort reports and simplify the certification process.

34. Award Set-up

105. Use one system to log proposal and award information.

Add additional fields to the DMS system to incorporate the information currently recorded in separate shadow systems that track award data. This will create one log for award information. Have the award information linked directly to the proposal data that was logged into DMS at the time of proposal submission.

106. Require all sponsor and SFSU approvals and disclosures to be complete before an award is set up in PeopleSoft.

All required sponsor and SFSU documentation and approvals, including financial Conflict of Interest disclosures and human and animal subject protocols should be complete and active before a project is activated in PeopleSoft.

107. Utilize project attribute screens in PeopleSoft.

Award specific information, including Financial Reporting and Billing requirements, can be saved onto the project attribute screens in PeopleSoft FMS. Logging the information in the attribute screens at the time of award set up creates a centralized source for award specific information that is accessible across administrative offices at SFSU. Additionally, it increases the reporting capacity of PeopleSoft to schedule reports and invoices and provide other attribute specific reports while decreasing the need for shadow systems.

35. Records Retention

108. Maintain all documentation related to sponsored projects in ORSP and Fiscal Affairs award folders.

Copies of documentation related to a sponsored project, including Human Resources documentation and information not available electronically in PeopleSoft, should be filed in the ORSP and Fiscal Affairs award folders. This may require other central administration offices (but excludes departments) who deal with awards to forward original records to either ORSP or Fiscal Affairs Accounting to be filed.

109. Develop a schedule for purging documents.

OMB Circular A-21 states that sponsored project records should be maintained for a period of three years from the submission date of the final expenditure report. Destroy files past this retention period to provide space for current documentation.

110. Review the record retention procedure for equipment.

Some sponsors, including the federal government, have specific records retention requirements. Develop an Equipment Management procedure to track this equipment and which project was used to purchase it.

Consider using the Asset Management System to track equipment purchased using federal funds (also see action item 40 Technology, #120).

36. Financial and Management Reporting

- 111. Develop key financial and management reports to measure the effectiveness of business processes in sponsored project administrative offices.**

Examples of these reports are listed below:

Institutional Performance Measures:

- Total number of new sponsored projects awarded to SFSU annually.
- Total number of new sponsored projects awarded by each sponsor.
- Total number of new sponsored projects awarded by college/department.
- Total expenditures for sponsored projects.
- Total expenditures for sponsored projects by sponsor.
- Total expenditures for sponsored projects by college/department.

General Research Administration Reporting Measures:

- Number of new proposals submitted versus new awards received.
- Percent of effort reports completed in the designated timeframe.

Pre-Award Reporting Measures:

- Average number of days between Receipt of PI checklist and submission date.

Post-Award Reporting Measures:

- Average number of days to set-up an award.
- Total number of cost transfers per month.
- Total amount spent above the award amount.
- Dollar amount of write-offs related to sponsored projects.
- Dollar amount of residual funds for fixed price agreements transferred to departments.

Fiscal Affairs Reporting Measures:

- Number of active projects past their end date.

- Number of late financial reports.
- Number of revised financial reports.
- Average accounts receivable balance for sponsored projects.
- Average number of days for outstanding accounts receivable.

112. Set target benchmark goals for the financial and management reports that support continuous improvement and stimulate exceptional performance.

Target benchmark goals should be responsive to an environment that continually changes. Goals should be established that stretch normal levels of performance. Setting goals that are considered aggressive is a characteristic of high performing organizations, and there is a correlation between setting aggressive targets and achieving better performance.

Employees should participate in setting performance goals. This participation (1) creates consensus about the goals, (2) fosters an environment of ownership towards achieving the desired goals, and (3) provides necessary motivation for achievement and success.

113. Monitor the financial and management reports and communicate the outcomes in a meaningful way to SFSU leadership.

On a quarterly basis, the financial and management report results should be summarized in a useable format that allows SFSU leadership to review the performance, and identify a need for action on a timely basis. A quarterly meeting should be held to review the management reports and to address any concerning issues. These reports will help SFSU better understand the needs of sponsored project administration and quickly inform leadership of potential risk.

37. Invoicing:

114. Use PeopleSoft to schedule invoices.

Populate the Award Attribute screens to list invoice due dates and identify what type of invoice is required by the sponsor. A monthly report can be generated from this information for Fiscal Affairs to schedule invoices. This should reduce the time needed to complete monthly billing, reduce the chance for errors and decrease reliance on shadow systems.

115. Develop a new enhanced invoice template in ARM with input fields that match the PeopleSoft Snapshot Report*.

Develop an invoice in ARM with input fields for the following categories:

- General expense categories (e.g., salary, benefits, equipment, supplies, travel, subcontract expenses, F&A, etc.)
- Amount budgeted per expense category
- Current period expenses per category (total expenses less previously billed)
- Total expenses per category to date

This will eliminate the need to manually create supplemental schedules to attach to invoices.

**The Snapshot Report is a report Huron recommends based on the Expenditure and Revenue Analysis Report that will list the same information, but group expenses by the same categories as listed in the invoice template. This will allow the Fiscal Affairs Accountant to populate the invoice template based on the information on one report.*

116. Reduce the amount of supporting documentation attached to the invoice sent to the sponsor.

Supporting documentation should only be sent with the invoice when it is required by the sponsor or the sponsor has historically requested additional supporting documentation. Including extra documentation with each invoice creates additional work and increases the chance for error and may make the sponsor's review more difficult.

38. Direct and Indirect Charging

117. Communicate OMB A-21 expense regulations through a Direct and Indirect Charging Procedure.

Use the Direct and Indirect Charging procedure to train ORSP and Fiscal Affairs staff on allowable and unallowable costs for sponsored research. Additionally, develop information to assist PIs and departments with evaluating expense items that are charged to sponsored projects.

118. Create budget control in PeopleSoft that limits the expenditures charged to a project to the awarded amount.

Expenditures over the awarded amount should not be able to be charged to a project. Personnel expenses over the budgeted amount should go into a "Suspense Account" and non-personnel expenses should not be able to be entered in PeopleSoft.

39. Procedure Documents

- 119. Develop a process for reviewing and updating the procedure documents on an ongoing basis.**

40. Technology

120. SFSU should form a committee to address the reporting needs for sponsored projects.

The committee should consider the following steps:

- Determine the type and source of research financial and other managerial data currently relied upon. This may involve inventorying reports and queries used by ORSP, Fiscal Affairs, and departments and understanding the frequency of use for each report.
- Understand the additional research financial and other managerial reporting needs to assist in the day-to-day management of the office or department.
- Understand the primary source that the data is gathered from (i.e., Are reports coming from PeopleSoft or another database?)
- Determine if the data being captured is actually being used. Determine if there is data that is needed that is not being captured.
- Understand what users like about the current approach and what they do not like. Determine what reporting functionality the users would like to have. Identify preferences for general reports, queries, centrally generated reports, library repositories, etc.
- Identify the gaps resulting from the previous analysis.
- Develop an approach that addresses the reporting gaps, and suggests an approach for reporting.

Opportunities to enhance reporting include:

- Develop a one page summary report that rolls expenses into the budget categories on the standard SFSU invoice template. This report should be used when preparing invoices and include information such as: budgeted amount, period expenditures, cumulative expenditures, encumbrances, and remaining balance.
- Enhance the Revenue and Expense report to provide additional detail for personnel expenses.
- Create an electronic AR aging report
- Prepare reports to increase the efficiency of the LOC draw preparation
- Prepare reports for when invoices are due (attribute screens would need to be populated)
- Prepare reports for when Financial Reports are due (attribute screens would need to be populated)

- Consider using the Asset Management System to track equipment purchased using federal funds
- Prepare reports that schedule when a project should be closed (attribute screens would need to be populated)

Note: SFSU is currently considering developing a data warehouse. A review should be done to determine the additional reporting functionality that will be provided that is critical to managing sponsored projects. It is also important to consider how a data warehouse would integrate with PeopleSoft.

121. Minimize the use of technology outside PeopleSoft (i.e., “shadow systems”).

There are several shadow systems used to record information on research related transactions, and general award requirements. Many of these shadow systems do not link the data to PeopleSoft, or they link data on a limited basis. Much of the data in these systems is duplicative. Examples of shadow systems that could be completely integrated or more integrated with PeopleSoft by populating the attribute screens in PeopleSoft GL and/or adding a adding a small number of additional fields include:

- Document Management System (Multiple Logs)
- ORSP Database
- FileMaker Pro (Multiple Logs)
- Fiscal Affairs Excel Spreadsheets that record award financial reporting requirements
- Fiscal Affairs Excel Spreadsheets that record award invoicing requirements
- Fiscal Affairs Excel Spreadsheets that record outstanding Accounts Receivable

122. Utilize PeopleSoft more effectively.

Examples include:

- Use the attribute screens to track sponsored project information across departments
- Allow “view only” access across departments (e.g., attribute screens, reports, etc.)
- Create expenditure item date field
- Restrict project expenditures by expenditure item date
- Create “On Hold” status

123. Record expenditure item dates as well as posting dates for personnel and non-personnel expenses.

Current GL reports include only posting dates. Expenses on a sponsored project are constrained by the project period. Using expenditure item dates and posting dates, will assist ORSP to identify late cost transfers and expenses that were charged outside a project period.

124. Implement a system designed for grants management.

SFSU recently initiated a project to prepare for the implementation of a grants management system.

125. All MS Excel spreadsheets that contain important information should be backed up to the shared (network) drive.

Fiscal Affairs and ORSP management should review the templates and documents their staff are using and make sure they are saved to the network.

41. Training

- 126. The central research administration offices should create a training process for new and existing staff.**

The desktop procedures developed during the Huron project should be used as a reference manual to support the training initiative.

- 127. Determine the research administration training needs of faculty, department research administrators and central research administrators. Develop and implement a research education program to meet these needs. SFSU should consider making training mandatory.**

This may include the following:

1. Faculty/Department Staff role in compliance
2. Overview of Procedures
 - Grant hiring
 - Payroll (absence reports, limit on students' hours, etc.)
 - Direct and indirect costs
 - Travel
 - Cost sharing
 - Purchasing / P-Cards
 - Conflict of interest
 - Program income
 - Close outs
 - Cost transfers
 - Reporting effort
 - Export controls
3. Available Resources
4. Where to go with questions

42. Roles and Responsibilities

- 128. Post the external procedure documents developed during the Huron project on the ORSP website.**

As SFSU's research enterprise continues to expand in its size and complexity, it is critical that all units managing sponsored projects have a clear understanding of their roles and responsibilities. This includes defining the expectations of faculty, department chairs, and college deans in this process.

- 129. ORSP and Fiscal Affairs management should review the procedure documents developed by Huron with their staff.**

43. Communication

130. When possible, Fiscal Affairs and ORSP should develop collaborative approach and shared responsibility.

To provide the most effective compliance oversight and the best service to faculty and department staff, a collaborative approach between the central offices is necessary. There is interaction between offices during a number of procedures such as financial reporting, closeouts, sub-recipient monitoring, and accounts receivable. Timely decision making requires ORSP and Fiscal Affairs to maintain a reciprocal level of communication concerning pending awards, awards requiring action, and have a common knowledge of the status of all awards. Consider in addition to the current communication, monthly meetings between the Grants Administrators and Accountants to discuss outstanding items and issues. Additionally, establishing collaborative teams such as the Closeout taskforce increases collaboration and shared responsibility.

44. Website

131. Update the ORSP website.

The ORSP website should be the initial source where the University Community goes for all sponsored project information. Reorganize the information on the ORSP website and continually update the website with information regarding the entire lifecycle of a grant at SFSU.

- The online PI Checklist is a valuable tool that brings faculty to the ORSP website and the page can be used to enhance communication with faculty.
- Include ORSP forms, proposal development procedures, and specific information outlining the responsibilities of the PI in the proposal submission.
- Include a specific section for proposals submitted through the SFSU Foundation.
- Use email to promote the use of the website as a central source of information and communicate any updates to the University Community.
- Include a Frequently Asked Questions Section with specific contact information for additional questions.

132. Update the Development Office website.

Coordinate the content on the Development Office's website to avoid outdated information. ORSP information should be maintained on the ORSP website and a link should be provided from the Development Office website.