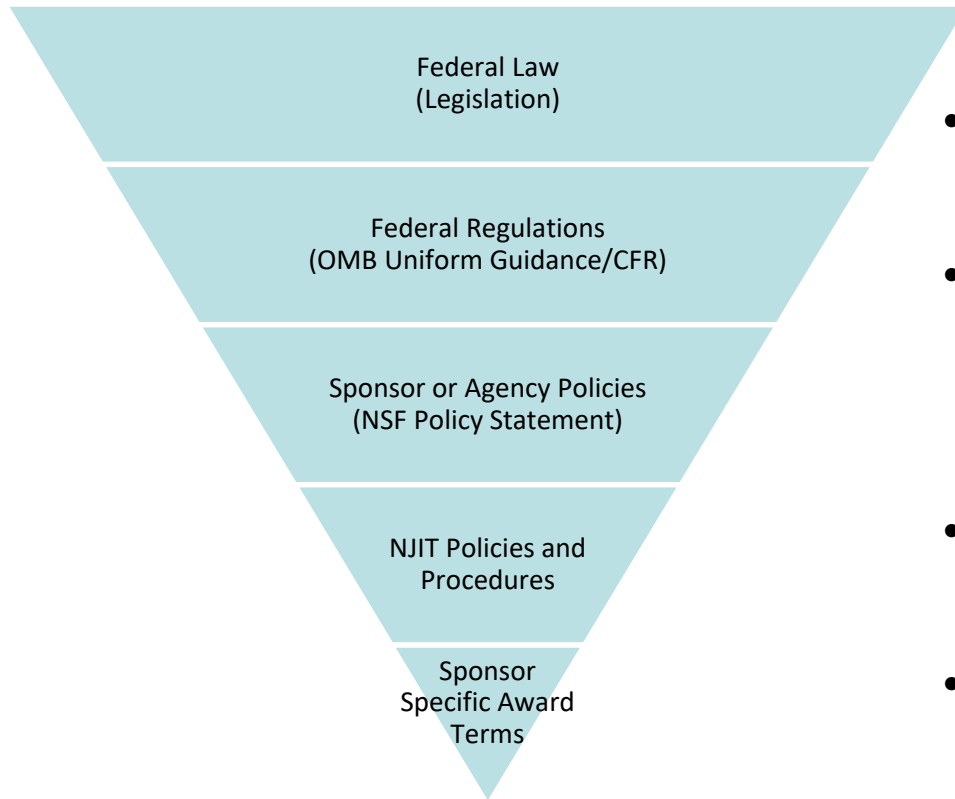


Grant Management: Post Award

Compliance Requirements



- There are varying levels of regulations that govern Sponsored Funds.
- The order of precedence usually starts with the individual award terms and then each layer of regulation is applied to determine the applicable rule.
- In most cases, the more stringent or restrictive rule of all the layers apply.
- Audits are conducted at different levels to ensure the entity is compliance with all these regulations.

Compliance Requirements

- [Code of Federal Regulations](#) – CFR
 - CFR is the codification of the general and permanent rules and regulations (sometimes called [administrative law](#)) published in the [Federal Register](#) by the executive departments and agencies of the [Federal Government of the United States](#). The CFR governs all grants and contracts sponsor by the Federal Government.
- [Uniform Guidance](#) - (2 CFR 200)
 - This "government-wide framework for grants management" is an authoritative set of rules and requirements for Federal awards that synthesizes and supersedes guidance from earlier OMB circulars.
- [Compliance Supplement](#) - (2 CFR 200, Appendix XI)
 - A large extensive US government guide created by OMB and used in auditing federal assistance and grant programs, as well as their respective recipients.

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General Comments

- The Principal Investigator (PI) is responsible for the programmatic, as well as financial management of the award. PI is usually listed as the Fund Manager on the Banner Index.
- The PI, administrative support staff and the Office of Research must review the terms and conditions to ensure proper stewardship of the award.

Please visit the NJIT webpage for more information:

<https://www.njit.edu/research/researchers/>

Office of Research

Post Award Management

All transactions on grant indices are reviewed for approval by the Post Award Management unit*. These include:

- Budget transfers/modifications for all categories (salary/non-salary)
- All personnel action from modifications (PAFs)
- Graduate Nomination Forms
- Cost transfers (reallocation of expenses)
- Purchase Requisitions-Over \$1K
- Chrome River Reimbursements
- Modifying F&A

*In some cases, prior approval from the sponsor is required to proceed with a transaction. This will be coordinated through the Pre-Award Services unit at the Office of Research.

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Subcontracts

Step 1: PI works with Pre-Award services to develop, negotiate and finalize contracts with sub recipient.

Step 2: Pre-Award services executes signed contract and sends to PI.

Step 3: Upon receipt of executed contract, department personnel submits the requisition (within 3 days) to request the purchase order.

- If agreement is over \$25K, two requisitions need to be entered for subcontracts to be in compliance with 2CFR200
- 1st Req: up to \$25,000 use account code 756110 (Subcontract <= 25K)
- 2nd Req: Remaining balance above \$25,000 use account code 756111 (Subcontract > 25K)
- Subcontract requisitions are submitted to pre-award and post-award for approval

Note:

- Entry of the requisition on the system should not occur prior to the executed agreement
- Subagreement and PO must be in place for subrecipient to begin work.

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Grant Closeouts

- **Final Reconciliation and Closeout**
 - Depending on final invoice due date, all expenses must be paid within 30-90 days from grant end date.
 - Once grant is reconciled, billed and all payments collected, the grant will be terminated within 120 days from grant end date.
- **As grant end approaches, the following actions should be in progress:**
 - Reallocation plan for all personnel or termination.
 - Pending transactions have been approved.
 - Recurring charges and stating orders are closed out.
 - Purchase Orders and encumbrances are closed out.
 - Deficit on grants have been removed.
 - Subcontract invoices have been received and approved for payment
- **Cost Share Accounts** - During the closeout period, cost share accounts will also be terminated.

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Other Items

- **Proactive grant management**
 - Reduces risk for non-compliance
 - Allows for timely submission and/or correction of transactions
- **No Cost Extension:**
 - PI requests a no cost extension to Office of Research prior to grant ending.
 - Office of Research reviews and submits for sponsor approval.
 - Once approval is received, the system will be updated.
- **Continuations and Amendments:**
 - Updates to Banner Indices must be supported by official sponsor documentation.
 - These must be received and reviewed by the Office of Research.
 - Once approved, Office of Research updates the system.

All policies and procedures related to grants and contracts are located on the NJIT website:
<https://www.njit.edu/research/researchers/policies-forms.php>