Agenda

1. Overview
2. Key Changes
3. Escalation Process
4. Hot Topics
5. Differences between UG & A21 awards
6. Open Items
Sponsored Expenditures Guidelines Overview

• Formerly the “Guidelines for Federal Expenditures”

• Now called the “Sponsored Expenditures Guidelines”

• Updated for references to Uniform Guidance

• Input from departments regarding what would be useful information to include

• Effective Date: December 26th, 2014
Sponsored Expenditures Guidelines Key Changes

• Includes both Federal & Non Federal

• Guidance vs. Policy

• Following Sections Added:
  o Escalation process
  o Documentation and justification
  o Expanded categories of cost
  o Prior written approval – list
  o Other related information section
  o Appendices
    o Special Considerations for NIH Federal Training Grants
    o Cost Allocation Methodologies
Escalation Process

Review & Decision Hierarchy

1. Departmental

2. School/tub (HMS Allowability Panel)

3. Central Council – Expenditure Review Committee
   - Senior staff from central and school research offices, approximately 5-7 members
   - Decision based on minimum of 3 responses
   - Turnaround in 3 days
Selected Sponsored Expenditures Guidelines “Hot” Topics

Administrative and Clerical Salaries
  • References the revised “Admin & Clerical Salaries on Fed Awards” policy
  • Identifies the 4 new criteria
  • Only applicable to grants under UG

Alcohol
  • Not allowable on Fed awards except in very unusual circumstances
  • On non-Fed awards must meet T&C’s of award and be reviewed prior to expenditure
## Compensation

- **Sections**
  - Bonuses
  - Maternity/parental leave
  - Severance
- **Special Considerations**
  - Compensation cannot increase due to available funding
  - No payments to supplement a fellowship from Fed awards
  - No Harvard employees can be paid as consultants or vendors
## Selected Sponsored Expenditures Guidelines “Hot” Topics

### Conferences
- Allowable on Fed awards if one criteria is met
  - Presenting results of a specific award
  - Conference is directly related to award being charged
  - An aim of the award is to host a conference
  - Treat as indirect if the conference is to gain general info

### Equipment
- Distinction between “special purpose” & “general purpose” equipment
- Routine repairs
- Purchases at the end of awards
Exchange Rates

- Increases of expense due to exchange rate fluctuations ARE allowable
- UG grants only

Materials & Supplies - Computing Devices

- **Definition**: Machines used to acquire, store, analyze, process & publish data electronically including accessories for printing, transmitting, & receiving or storing electronic info
- Computing devices costing <5,000 that are essential to the performance of the award may be charged to awards
- UG grants only
### Recruitment and Relocation Costs
- Limited allowability to directly charge these costs
- Specific criteria for each category
- Employee must stay 12 months
- Short term VISA costs are allowed (UG grants only)

### Travel Costs
- References the University policies
- Specific list of unallowable expenses
  - Limos
  - Commuting or any travel when not in “travel status”
- Entire trip must be consistently
Differences Between UG & A21 Grants

- Admin Salaries
- Computing Devices
- Visa Costs
- Prior Approvals
- Procurement Rules (still open)
- Focus on Internal Controls
Open Items - to be Addressed Later

- Procurement – Awaiting government clarification
- Travel and Entertainment (T&E)
  - Awaiting results of the RMAS T&E audit
  - Should the T&E policy be more restrictive when using sponsored funding? Should we require PI sign-off on certain exceptions?
- How to identify A21 vs UG awarded grants