



WILLIAM & MARY

Office of

SPONSORED PROGRAMS

Financial Management Overview

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DIRECT COST GUIDELINES

Direct costs are expenditures that can be identified and allocated to a specific sponsored program fund. For federal awards and sub-awards, these costs must meet the definitions and requirements outlined in OMB Uniform Guidance 2 CFR 200 Subpart E which outlines the concepts of allowability, allocability, and reasonableness. For non-federal awards, proposed expenditures will be evaluated to ensure compliance with award guidelines. All expenditures are also evaluated for compliance with state and university directives. The most important factor in the review process is confirmation that any expenditures posted to the fund must provide direct benefit to the approved scope of work.

Following is an overview of principal cost categories charged to sponsored projects detailing the guidelines and process for obtaining approval for each. It is W&M policy that planned expenditures should be reviewed for compliance and appropriateness PRIOR to incurring the obligation.

All supplies and materials, travel, contractual services and other direct costs must be approved **prior to purchase**. Each item must be necessary to accomplish the project and specifically allocable to the project being charged. If an item(s) is going to be used on more than one project, only the portion directly appropriate to the project should be charged to the index. BuyW&M will be used for all purchases of goods and forwarded through the appropriate OSP administrator for approval. Blanket purchase orders should be used for “repetitive” buys such as at Lowes, Ace Hardware, and Staples.

GENERAL OFFICE SUPPLIES

General Office Supplies such paper, pencils, pens, ink, toner cartridges will not be approved on federal awards. Exceptions to this guideline consist of instances where the purchase of the supplies is extensive in nature, specifically identified to the purpose of the project, **and** meets the definition of a eligible direct charge as defined above.

COMPUTERS

Computing devices are defined in the Uniform Guidance, 2 CFR §200.20 and 2 CFR §200.94:

Computing devices means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or "peripherals") for printing, transmitting and receiving, or storing electronic information.

A computing device is a supply if the acquisition cost is less than \$5,000, regardless of the length of its useful life.

POSTAGE AND SHIPPING

Postage and Shipping costs supporting routine activities should not be charged directly to sponsored funds since they are part of the general administrative costs covered by the university's F&A agreement. Exceptions to this guideline include projects requiring extensive mailing and shipping costs such as those involving surveys and large-scale publication distribution.

TELEPHONE AND COMMUNICATION COSTS

Telephone and various other Communication costs supporting normal activities should not be charged directly to sponsored projects. For example, installation charges, recurring monthly use charges, local calls, pagers, and cell phones are included as part of F&A costs. Some exceptions may include extensive long distance calls or toll-free numbers that are needed to accomplish the goals of a specific project. Requests for cell phones will be evaluated on a case-by-case basis and will be evaluated based on the needs of an individual project may be appropriate in instances such as location of personnel at a remote location or in situations when the phone is needed for other safety reasons.

MEMBERSHIPS, SUBSCRIPTIONS & BOOKS

As noted above, Uniform Guidance, 2 CFR 200 specifically states that individual memberships in civic or social organizations are unallowable. Individual memberships or subscriptions to professional groups or periodicals are unallowable as direct costs on federal awards

Technical books and subscriptions may occasionally be required to achieve the goals and objectives of an award, particularly for fellowships or training grants. Direct charges for these items may be allowable if the investigator confirms that specific information is contained in the publication(s) is directly related to a specific goal or outcome of the project. For example, a specific testing protocol that must be followed to

validate research results. Further, the cost must be allocable to the award(s) with a high degree of accuracy. As with general office supplies and materials, books that contain general information generally would not meet the criteria of direct benefit to the specific project.

PRINTING & PUBLICATION

Printing, binding, publication and copying expenses are normally allowed as a direct charge to sponsored awards since these costs are considered to be part of the dissemination of research results. Use of external or central service copy services may be charged to sponsored projects, but invoices must be retained as documentation to support the charge.

Copying proposals or general correspondence not related to a specific project may not be charged directly to federally sponsored projects. Further, charges associated with the operation of a general copy machine such as paper or tone may not be charged to a sponsored project.

SUPPLIES

Supplies for field and laboratory use directly related to the project are appropriate charges to sponsored projects provided the items are needed solely to advance the work under the sponsored agreement, comply with general grant and contract guidelines and individual award requirements, and procurement of

the items is consistent with federal, state and university requirements. All supplies should be approved by OSP prior to purchase using BuyW&M. Requests for after-the-fact reimbursement must be accompanied by justification for the purchase.

Requests for supplies will be closely scrutinized in the final 60 days of the project period to confirm that the items are needed to complete the scope of work since charges late in the project are subject to special review by federal agencies to ensure that there is a minimal residual inventory since federal guidelines mandate that the government should be reimbursed for its share of a residual inventory greater than \$5,000. Also, recent NSF audits questioned whether last-minute purchases actually benefit the project.

EQUIPMENT

Equipment is defined as items with an acquisition cost of \$5,000 or greater with a useful life of more than one year. In some instances a project may involve equipment fabrication which means multiple items that would normally be classified as supplies (individual costs less than \$5,000) are purchased to create/fabricate an integrated unit of equipment having a total value of \$5,000 or more. In these instances, the purchases should be identified and combined to document the fabrication of a piece of capitalized equipment.

Equipment should be identified, budgeted and justified in the proposal. All purchases must be processed through BuyW&M and approved by OSP. NO requests for equipment purchases will be approved during the final 90 days of a project without specific agency approval and justification for the purchase at the end of the project. Late obligation and purchase of equipment items is a point of concern for auditors who question the need of such purchases when the project is almost complete.

TRAVEL

Travel budgets should be included as part of the proposal submission process. As with all expenses charged to sponsored projects, such costs may only be posted when it can be confirmed that the travel directly benefits the project. Travel is one of the most complex and strictly regulated categories of expenditure, subject to federal, state and university guidelines. All travel should be approved PRIOR to the trip using the College's Travel Authorization Form available on the General Accounting website. Prior approval is important since it ensures that the travel is appropriate for the grant index being charged and protects employees by confirming that they are College employees on official business during the travel period. Failure to obtain prior approval means that travelers risk not receiving reimbursement from sponsored program funds.

Travel authorizations may be submitted digitally to the OSP administrator who will review, approve and return. Approval must be requested for all sponsored program travel – local, foreign and conference. Approval for local travel may be requested for the project period. Conference, meeting and foreign travel will be approved individually. Travel reimbursement requests do not need OSP approval since an authorization form has been reviewed and approved.

Travel must conform to all regulations and be within published cost limits. Additionally international travel supported by federal funds must follow Fly America mandates.

MEALS AND FOOD

While meals included in travel authorizations and meeting state/federal guidelines generally are not a problem, meals and food provided as stand-alone expenditures continue to be a point of confusion. These costs are often the subject of audit examination. OSP has developed and distributed the following explanations to clarify how these costs should be managed on federal awards.

W&M's principal funding agencies directly address the meal/food issue in their Policy Manuals:

NSF – *"Travel, meal and hotel expenses of grantee employees who are not on travel status are unallowable. Costs of employees on travel status are limited to those allowed under the governing cost principles for travel expenses.*

(b) Meals and Coffee Breaks - No NSF funds may be spent on meals or coffee breaks for intramural meetings of an organization or any of its components, including, but not limited to, laboratories, departments and centers"

NIH – *"Allowable for subjects and patients under study, or where specifically approved as part of the project activity, provided that such charges are not duplicated in participants' per diem or subsistence allowances, if any."*

"When certain meals are an integral and necessary part of a meeting or conference (i.e., a working meal where business is transacted), grant funds may be used for such meals. The cost of meals served at a meeting or conference, for which the primary purpose is the

dissemination of technical information, is allowable. In all cases the cost of any meal must meet a test of reasonableness.

However, recurring business meetings, such as staff meetings, should not be broadly considered as meetings for the primary purpose of disseminating technical information in order to justify charging meals or refreshment to costs to grants.”

CONTRACTUAL SERVICES

“Contractual Services” encompasses a broad range of expenditure types. The intention to use external support to achieve project goals must be identified in the proposal. The principal investigator must describe what services will be contracted. OSP will assist in determining whether the cooperating entity will be a contractor or subrecipient. This is a critical distinction.

Contractors

A **contractor** is described in Uniform Guidance 2 CFR 200.331 as providing “goods and services within normal business operations” and providing “similar goods or services to many different purchasers.” Securing a contractor means that the formal procurement process must be followed. Since acquisition of a contractor may involve competitive bidding and use of a contract to formalize the arrangements, a contractor may not be named in the proposal. A contractor is paid based on completion of the task.

Subrecipients

On the other hand, a **subrecipient** is part of the proposal submission, is named in the proposal and will perform a portion of the scope of work as described to the funding entity. Subrecipient organizations must formally acknowledge the collaboration prior to proposal submission. A subrecipient receives compensation in a pass-through arrangement and is required to follow federal guidelines including the requirements of Uniform Guidance 2 CFR 200. A subrecipient is responsible for meeting specific performance targets, is paid based on submission of invoices as described in the subrecipient agreement and is expected to submit final financial and other mandatory federal reports. Further, compensation for the subrecipient is subject to approval by the principal investigator that progress is satisfactory and that costs are reasonable for the work completed.

FOOD/MEALS

Charging Food/Meals to Federally Sponsored (and Federal Flow-Down) Projects:

This statement is provided to confirm William & Mary’s procedures on direct charging of food/meals to sponsored projects **while not in travel status**. While many of these regulations have been in place for a number of years, federal agencies are increasing their scrutiny of expenditures posted to federal awards.

While state and College policies may permit spending other types of funds for food/meal expenses, it is important to realize that such expenditures may not be allowable on sponsored projects. Costs allowable to sponsored projects are reviewed and approval is based on sponsor guidelines, university and state regulations and guidelines and approvals associated with the specific award document.

The cost of food/meals while not in travel status will normally not be allowed as a direct charge on federally sponsored (or federal flow-down) projects. These costs are typically considered a personal expense.

There are events and meetings where food/meal costs may be an allowable charge to a federally sponsored project. The criteria for determining allowability are:

1. The cost must be **not be expressly disallowed by the institution**, both under federal and sponsor regulations, AND under the terms of a specific project.
2. The cost must be **allocable**, that is, the project which pays the expense must benefit from the event or meeting that includes the food/meals. More specifically, the food /meals must be integrated into a project-related event.
3. The cost must be **reasonable**, that is, must reflect the action a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made. Costs per person should not exceed W&M per diem rates).
4. Participants/employees typically should not be solely university employees. There should be speakers/attendees from other employers/institutions.
5. All documentation requirements must be met as described below.
6. The event or food/meals could not be perceived as entertainment, hospitality or otherwise unnecessary to achievement of project goals. The food/meal costs must be integral to delivery of project goals.

Meals, Business Expenditure Type:

“Meals, Business”, should ONLY be used for meals in NON-travel status. Travel-related meals should be expensed using the appropriate “Travel, Subsist & Lodging” expenditure type.

Documentation Requirements:

All expenditure types for food costs in non-travel status (Svc, Catering; Supplies, Food Svc; Meals, Business; Supplies, Food and Drink) must be approved in advance for each individual occasion. For any food/meals in non-travel status, departments are responsible for providing the following documentation:

1. Dated agenda or other written document that clearly explains how the meeting/event furthers project goals/aims.
2. Roster of people attending, including the name of each attendee’s institution/employer.
3. Technical role/affiliation with the project of each attendee.

General Federal Guidance

The Code of Federal Regulations Uniform Guidance 2 CFR 200

§ 200.432 Conferences: A conference means an event whose primary purpose is to disseminate technical information beyond the recipient or subrecipient and is necessary and reasonable for successful performance under the Federal award. Allowable conference costs may include the rental of facilities, speakers' fees, attendance fees, costs of meals and refreshments, local transportation, and other items incidental to such conferences unless further restricted by the terms and conditions of the Federal award. The costs of identifying and providing locally available dependent-care resources for participants are allowable as needed. Conference hosts/sponsors must exercise discretion and

judgment in ensuring that conference costs are appropriate, necessary, and managed to minimize costs to the Federal award.

§ 200.438: Entertainment costs. Costs of entertainment, including amusement, diversion, and social activities and any associated costs (such as gifts), are unallowable unless they have a specific and direct programmatic purpose and are included in a federal award.

Specific Federal Agency Guidelines

- **NIH** – see Grants Policy Statement
- **HHS** Policy on the Use of Appropriated Funds for Food.
- **NSF** Proposal and Award Policies and Procedures Guide
- **Dept of Defense** – (also see Federal Acquisition Regulation 31.205-14).
- **Dept of Education** Memorandum to Grantees Regarding the Use of Project Funds for Conferences and Meetings

This is not a complete list of all sponsors. It is necessary to confirm sponsor requirements and terms and conditions for each agency. Further, it is important to note that in today's financial climate, agencies are changing guidelines and scrutinizing all expenditures to ensure that only costs that are necessary to successful project completion are billed to the award.

FREQUENTLY ASKED QUESTIONS

1. Is it allowable to take a job candidate applying for a position on the project or visiting researcher collaborating on the project out to dinner for an interview or project related discussions?

YES, IN PART - The candidate or visiting researcher's meal could be paid under travel status. The cost of the meals for the PI or other W&M employees are not allowable on the project but may be allowable on other funding sources.

2. Is it permissible to charge the costs of providing refreshments and/or meals to the project during the conference on a federally sponsored project that requires coordinating and hosting a Conference.

YES – the costs of meals/refreshments during a conference/seminar/meeting with a formal agenda, attendee roster and participants from different locations are allowable. These prospective expenditures should be included as part of the proposal budget submitted to the funding agency. Note: Taking out of town participants out for a meal, separate from the event, is not allowable.

3. A PI holds periodic meetings with co-investigators/lab and other personnel to discuss the progress on a federally sponsored project. Can the cost of the meal be charged to the project?

NO – routine meeting meal or refreshment costs are not allowable. The charge may be allowable as Business Meals on other funding sources.

4. When a PI is traveling to another state to visit with a subproject collaborator is it allowable take the collaborator to dinner and charge the meal to a federal project?

YES, IN PART– The W&M PI may charge a meal as a travel expense for their own meal. The cost of the collaborator's meal should not be charged to the federally sponsored project, but it may be an allowable charge on other funding sources as a Business Meal.

5. Is it allowable to charge food for an internal meeting of project co-investigators within W&M at a local restaurant or as an internal catered event?

NO – Regardless of the location, meeting meal or refreshment costs for W&M personnel not in travel status are not allowable on a federal project. These charges may be allowable on other funding sources.

6. Some federal projects that require that investigators hold routine advisory committee meetings with various collaborators from all over the country or involve outreach with local organizations. Can the cost of food/meals be charged to the project?

YES – Assuming all documentation requirements are met, the cost of meals/refreshments during a Conference/Seminar/Meeting with a formal agenda and participants from different locations is allowable. Note: Taking out of town participants out for a meal, separate from the event, is not allowable.

INDIRECT COSTS

Facilities and Administrative Costs (F&A) are costs negotiated with the federal government and represent the expenses associated with sponsored programs that cannot be directly assessed and allocated to individual projects. These expenses include utilities, administrative and clerical support such as secretarial/administrative support, general use equipment, office supplies, postage, local telephone costs, memberships/subscriptions, and facilities/building and equipment usage and depreciation. Generally these costs may not be charged to federal awards since direct charging would result in a double billing to the federal government: once through the F&A negotiation and then directly to the federally funded award.

In certain limited instances, administrative expenses that are directly appropriate to and necessary for an individual project may be charged to federal awards, but doing so requires advance planning during proposal submission as well as written justification during the procurement/expenditure approval.

Instances that may justify exceptions to the limitations on charging of administrative and clerical expenses include:

1. Large, stand-alone projects such as educational centers that require extensive publication or administrative support in excess of normal administrative support.
2. Projects that require extensive data collection, surveys, and analysis.
3. Projects that require making travel and meeting arrangements for large numbers of participants, such as conferences and seminars.
4. Projects involving preparation and production of manuals, reports, and publications other than routine progress and technical reports.
5. Projects that are located at locations geographically remote from normal campus locations and administrative services.

NOTE: Plans to charge administrative expenses should be identified and justified in the proposal budget justification and approved by the funding agency. During the project period any decision to charge costs normally considered to be an F&A cost must be justified using the W&M Exception Form.

WILLIAM & MARY MATCH ACCOUNTING

DEFINITION:

Each proposal submitted to a funding entity requests financial assistance for a defined scope of work. When costs to perform the work exceed the amount received from the funder, the university must identify other sources to support the project. Match or cost-share is part of the total cost of a project that is not supported by external funds awarded. There are several types of match or cost share.

- Cash match is comprised of funds provided by departmental E&G funds, private funds, or another non-federal award that has been designated as a companion project to the federal award. It is important to note that match is “real” money and must be documented.
 - The costs must be verifiable through university accounting records, may not be provided by other federal sources, and must not be used as match for any other award.
 - The costs must be incurred during the time frame of the awarded project. In other words, equipment purchased before the project began cannot be declared as match.
 - Costs declared as match must meet the same standards for allowability, allocability and reasonableness as costs posted to the grant itself. If the cost would not be appropriate to charge to the grant itself, it may not be used as match.
- In-kind or third-party match is support provided by an entity outside the W&M. This must be documented and certified for the project file since this cannot be verified through the accounting system. Additionally, valuation of the in-kind support must be reviewed to confirm that the budgeted amount does not exceed the fair-market value of the items included and the individuals or organization providing the in-kind match must document that they are aware of and approve use of their services or goods as match.
- Mandatory match is match or cost share required by the funding agency as a condition to receive an award.
- Voluntary committed cost sharing/match is university support which is identified as necessary to accomplish project goals but which is not required by the agency. It is important to note that if the university specifies an institutional contribution at the time of proposal submission and the agency makes an award, the match becomes a condition of the award and must be provided.
- Voluntary uncommitted cost sharing/match recognizes institutional support that would be needed if a project is awarded but is not included in the proposal to the funding agency. While there is no requirement to document the uncommitted contribution, it is important to identify such potential requirements prior to accepting the award.

POLICY:

It is William & Mary policy to identify all costs associated with a planned proposal, including any direct or indirect costs and long-term obligations that may result from receipt of an award. While full costing is critical to institutional management, submitted proposals should include only the minimum mandatory

match commitment. No proposal with a commitment for match will be submitted without approval by the appropriate Department Chair and Office of the Vice Provost for Research.

Final financial reports to be submitted to funding agencies to confirm direct and match expenditures must be prepared and certified by the Office of Sponsored Programs.

JOURNAL VOUCHERS/COST TRANSFERS

A journal voucher (JV) is an accounting document used to distribute internal costs and/or correct accounting entries. All JVs require careful review and documentation detailing the reasons for the transfer and/or change and should be signed by the originator and approved by the individual(s) with responsibility for the index being impacted by the cost transfer.

Expenses posted or transferred using JVs are often the target of audit scrutiny since after-the-fact transfers can indicate a failure to carefully review and control costs posted to grant accounts. These guidelines are meant to ensure that every JV entry is reviewed to ensure that all postings, whether for internal distribution/recharge or corrections are posted in a timely manner and with appropriate documentation and justification.

INITIAL CHARGES:

There are various costs incurred by internal departments that are later distributed via JVs to institutional expenditures indexes. Examples include printing, telephone expenses, machine shop billings, and purchases at the W&M Tribe Store (principally IT items). Since these are internal re-distributions, there is no review via BuyW&M to confirm allowability and allocability. Therefore any JV distributing internal charges to grant/contract funds must be reviewed and approved by OSP prior to posting in Banner.

COST TRANSFERS:

Transfers of previously posted charges are among the leading causes for audit findings and disallowances. Uniform Guidance § 200.405 “Allocable costs” states that:

Limitation on charging certain allocable costs to other Federal awards. A cost allocable to a particular Federal award may not be charged to other Federal awards (for example, to overcome fund deficiencies or to avoid restrictions imposed by Federal statutes, regulations, or the terms and conditions of the Federal awards). However, this prohibition would not preclude the recipient or subrecipient from shifting costs that are allowable under two or more Federal awards in accordance with existing Federal statutes, regulations, or the terms and conditions of the Federal awards.

W&M guidelines for processing JV entries for sponsored program funds:

- Transfers and requests for corrections should be processed no more than 60 days after the initial posting. Written justification must be included with the JV and should be approved by the department fiscal officer and OSP.
- If a transfer is requested more than 60 days after the initial posting, the transfer must be approved by the department fiscal officer, the principal investigator, the department Chair and OSP.
- Transfers during the final 90 days of the project will be closely reviewed to confirm the reason for the transfer.
- During closeout period any entries made in error will be transferred to departmental funds, not transferred to another sponsored award.

W&M SPONSORED PROGRAMS

JOURNAL VOUCHER (JV) CORRECTION REQUEST FORM

Please complete this form and attach to any expenditure transfers (to or from) a sponsored index. A transfer justification is required for any JV corrections posted to sponsored indexes.

Please include the following information:

- 1.) Why does this charge belong on the grant you're moving it to? This means that you can confirm that the project being charged will receive a direct benefit.

2. Why was the charge put on the wrong account?

If this cost transfer is for charges that were initially posted more than 90 days ago (i.e., the date when the expense was posted in Banner) or if the award/project is closed, please provide the following additional information:

3. Why is this cost transfer request over 90 days old? Why did it take so long to discover the error?
4. How do you prevent this from happening in the future?

Departments who process these cost transfers are responsible for maintaining and producing if asked, the supporting documentation for all cost transfer activity.

W&M SPONSORED PROGRAMS

Request for Exceptional Circumstance Approval

This request may be routed either in hardcopy or via email. Our office will accept a digital signature. The request should come from the PI or on behalf of the PI by an appropriate designee. Send this request to the award administrator in the Office of Sponsored Programs.

Principal Investigator Name:

Banner Index:

Agency Name:

Project Title:

Provide a full justification of why the item(s) is required and why an exception approval is appropriate:

STEPS IN THE HIRING/PERSONNEL PROCESS

- 1.) Identify the position(s) needed. This should be done during the proposal process. Among the questions to be answered:
 - a. Are these full-time or part-time positions?
 - b. Will these duties require new personnel or use existing employees?
 - c. Will the position be professional or operational?
- 2.) HR will provide guidance in planning for salary and fringe benefit requirements based on brief, preliminary job descriptions prepared by the PI.
- 3.) If it appears that the proposal will be funded, prepare and submit hiring paperwork to HR immediately.
- 4.) Post and advertise the position.
- 5.) Interview.
- 6.) Request to fill. WHEN HR HAS REVIEWED AND APPROVED,
- 7.) Make an offer to the candidate.
- 8.) Follow standard performance management guidelines as posted on the W&M HR website.

ON-LINE RESOURCES TO ASSIST IN THE PROCESS:

W&M Hiring Guidelines:

<https://www.wm.edu/offices/uhr/departments/hiring-officials-business-partners/>

Compensation:

<https://www.wm.edu/offices/uhr/departments/hiring-officials-business-partners/classification-compensation/>

LABOR ACCOUNTING GUIDELINES AND PROCEDURES

HUMAN RESOURCES

Distribution and certification of labor costs on grants and contracts is a critically important financial compliance requirement on sponsored program awards. The HR distribution process at William & Mary is based on the following federal requirements in Uniform Guidance, 2 CFR 200:

- Uniform Guidance, 2 CFR 200, § 200.403 **Factors affecting allowability of costs**
Except where otherwise authorized by statute, costs must meet the following criteria to be allowable under Federal awards:
 - a) *Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.*
 - b) *Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.*
 - c) *Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the recipient or subrecipient.*
 - d) *Be accorded consistent treatment. For example, a cost must 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) *Be determined in accordance with generally accepted accounting principles (GAAP), except, for State and local governments and Indian Tribes only, as otherwise provided for in this part.*
 - f) *Not be included as a cost or used to meet cost sharing requirements of any other federally-financed program in either the current or a prior period. See § 200.306(b).*
 - g) *Be adequately documented. See §§ 200.300 through 200.309.*
 - h) *Administrative closeout costs may be incurred until the due date of the final report(s). If incurred, these costs must be liquidated prior to the due date of the final report(s) and charged to the final budget period of the award unless otherwise specified by the Federal agency. All other costs must be incurred during the approved budget period. At its discretion, the Federal agency is authorized to waive prior written approvals to carry forward unobligated balances to subsequent budget periods. See § 200.308(g)(3).*
- Uniform Guidance, 2 CFR 200, Subpart E, General provisions for selected items of cost. § 200.430 Compensation—personal services. **Compensation for personal services.**
 - a) **General.** *Compensation for personal services includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the Federal award, including but not necessarily limited to wages and salaries. Compensation for personal services may also include fringe benefits addressed in § 200.431. Costs of compensation are allowable to the extent that they satisfy the specific requirements of this part and that the total compensation for individual employees:*
 1. *Is reasonable for the services rendered and conforms to the established written policy of the recipient or subrecipient consistently applied to both Federal and non-Federal activities;*
 2. *Follows an appointment made in accordance with the recipient's or subrecipient's laws, rules, or written policies and meets the requirements of Federal statute, where applicable; and*
 3. *Is determined and supported as provided in paragraph (g) of this section, when applicable.*

- Uniform Guidance, 2 CFR 200, Subpart E, General provisions for selected items of cost. § 200.430 Compensation—personal services. **Compensation for personal services.**

g) Standards for Documentation of Personnel Expenses.

1. *Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:*
 - i. *Be supported by a system of internal control that provides reasonable assurance that the charges are accurate, allowable, and properly allocated;*
 - ii. *Be incorporated into the official records of the recipient or subrecipient;*
 - iii. *Reasonably reflect the total activity for which the employee is compensated by the recipient or subrecipient, not exceeding 100 percent of compensated activities (for IHEs, this is the IBS);*
 - iv. *Encompass federally-assisted and all other activities compensated by the recipient or subrecipient on an integrated basis but may include the use of subsidiary records as defined in the recipient's or subrecipient's written policy;*
 - v. *Comply with the established accounting policies and procedures of the recipient or subrecipient (See paragraph (i)(1)(ii) of this section for treatment of incidental work for IHEs.); and*
 - vi. *Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.*
 - vii. *Budget estimates (meaning, estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, provided that:*
 - A. *The system for establishing the estimates produces reasonable approximations of the activity performed;*
 - B. *Significant changes in the related work activity (as defined by the recipient's or subrecipient's written policies) are promptly identified and entered into the records. Short-term (such as one or two months) fluctuations between workload categories do not need to be considered as long as the distribution of salaries and wages is reasonable over the longer term; and*
 - C. *The recipient's or subrecipient's system of internal controls includes processes to perform periodic after-the-fact reviews of interim charges made to a Federal award based on budget estimates. All necessary adjustments must be made so that the final amount charged to the Federal award is accurate, allowable, and properly allocated.*
 - viii. *Because practices vary as to the activity constituting a full workload (for example, the Institutional Base Salary (IBS) for IHEs), records may reflect categories of activities expressed as a percentage distribution of total activities.*
 - ix. *It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. Therefore, a precise assessment of factors contributing to costs is not required when IHEs record salaries and wages charged to Federal awards.*

PRINCIPLES OF PAYROLL DISTRIBUTION

Pursuant to Uniform Guidance, 2 CFR 200, W&M distributes salaries and the proportional fringe benefits on based on the federal concept of monitored work load. Salary and wage distributions are entered using the University's Personnel Action Form (<https://www.wm.edu/offices/uhr/documents/departments-forms/personnel-action-form.pdf>).

Salary and wage distributions to grants/contracts are based on a percentage of effort and should conform with proposal budgets and funding agency guidelines.

Those estimates are entered as percentages of total time into the University's Human Resource System which distributes the salary. The HRS system is the source of information for names and specific cost distributions for each charge. The totals are then posted in total to the Finance Module.

All distributions should be entered into the system PRIOR to the period of time covered by the distribution. In situations when the entry needs to be made after the initial date of the period covered by the PAF, a written explanation must accompany the late distribution plan. In no event will a change be entered to a sponsored program fund more than 60 days after the beginning date of the PAF.

PAFs for hourly employees must be processed PRIOR to the employee's beginning work on the grant/contract. Hourly employees enter their time using the Self-Service Banner Employee portal on myWM. Hours will be approved by the supervisor.

CERTIFICATIONS

Labor certifications are distributed three times each year at the end of each semester: Fall, Spring, and Summer. Forms are prepared for each individual charged to a grant or contract and must include all funds to which the employee's salary was distributed, both sponsored and institutional sources. The forms must be signed by the individual or by someone having first-hand knowledge of the employee's activity. Forms must be reviewed and returned to OSP within 30 days.

When changes are requested, corrections will be processed, and a revised Certification Form will be generated and signed.

In the event a change is requested after the signed certification has been processed, the request must be accompanied by a written justification and approved by the Dean.

HR Distributions/Corrections

- Salary authorization forms will be processed through the Office of Sponsored Programs for distributions to external awards.
- All individuals charged to an external award – either federal or non-federal – will receive an HR certification form each semester. This means 3 times per year – fall semester, spring semester, and summer.
- Any changes in payroll distribution will be driven by adjustments requested on the certification forms returned to the Office of Sponsored Programs.
- Changes may also be made by submitting a revised salary authorization form or by a request for re-cast during the period covered by the authorization form.
- All adjustments will correct salary and fringe benefits in separate Banner account codes (state subcodes) as appropriate to reflect an accurate, pro-rated distribution of each cost.
- JV salary adjustments will be used only when accompanied by a signed memo from the principal investigator.
- Once HR certifications have been approved, only a memo signed by the principal investigator and approved by the Department Chair will be acceptable documentation for changes in payroll records.

PROPOSAL SUBMISSIONS

VICE PROVOST FOR RESEARCH PROPOSAL SUBMISSION STATEMENT

The Vice Provost for Research (VPR) is the institutional official charged with ensuring that throughout all Schools of the College, the university's research enterprise is managed in accordance with federal, state, and institutional regulations and guidelines. As part of that responsibility, the VPR is charged with authorizing submission of all proposals for external funding. Further, it is the VPR's obligation to decline any award not processed in accordance with W&M guidelines.

The VPR and the Office of Sponsored Programs (OSP) would like to remind researchers of William and Mary's guidelines and requirements governing application, negotiation, and management of funds awarded by external entities. While these policies have been standard operating procedure for many years, newer members of our faculty may not be aware of the requirements, and it is appropriate to remind senior faculty of the importance of following guidelines that were put in place to protect all participants in the process. Investigators are served by a careful and timely proposal review that ensures submission of a professional document that complies with funding agency requirements. The university and taxpayers are protected when there is a careful evaluation of the costs and compliance and audit requirements of proposed projects. Further the proposal is the first step in meeting standards for financial and administrative audits. While all proposals must follow William & Mary's documented procedures, there are situations when it is particularly important to include the university to provide matching funds, buy special equipment, supply residence hall rooms, enhance infrastructure, make changes to buildings or grounds to perform proposed activities or obligate W&M to long-term commitments that may continue after the end of the award period.

Background

- A proposal is a document to any prospective funding entity regardless of whether the university will be a direct recipient or serve as a subcontractor or subrecipient with another organization. In other words, proposals to participate as a subcontractor must also be reviewed and approved using the same procedures.
- **ALL** proposals (or funding requests) to external agencies must be reviewed and approved by the Office of Sponsored Programs (OSP) **PRIOR** to submission.
- Faculty and staff members, including Principal Investigators and Program Leaders, and Project Leaders are **NOT** empowered to commit the College in contractual obligations.

Steps in the Submission Process

- 1) Contact the OSP as soon as you think you might pursue a call for proposals or whenever you think there might be an opportunity for funding for your work. The OSP will then assign a person to assist and help you in whatever way possible in assembling the submission package. It is important to have OSP personnel engaged as you undertake discussions with potential sponsors.
- 2) The first official step in the process is submission of the online digital routing and review form which has replaced the printed "yellow sheet." This form can be accessed at https://grants.wm.edu/wm_prod/index.cfm using your assigned WM log-on and password. Timely submission of the digital routing and review form, along with a rough draft budget and

proposal narrative should be submitted as soon as possible but **no later than 5 working days** prior to the submission date for the proposal. This will provide time to coordinate with Department Chairs, Deans, the VPR, and various compliance committees. Additionally, please realize that requests for supplemental resource commitments by the university, such as a need for facilities modifications, commitment for student housing, and reduced F&A require more time for review and approvals. In other words, the greater the need for institutional support, the earlier the routing and review form needs to be submitted.

- 3) The 5-day requirement allows OSP time to review documents and prepare the variety of mandatory forms and digital packages needed for on-line submissions. We are aware that investigators work on proposals until the last moment, so forwarding draft copies of all documents as you prepare them is a good way to initiate and expedite the review process.
- 4) Investigators are often contacted by agency personnel and program officers to discuss and negotiate specific details of potential agreements. While discussions with program officers/research directors can be appropriate and helpful, please do not offer extraordinary terms or conditions or over-promise what the institution will agree to do. Detailed negotiations may involve specifics of price, unrecovered institutional costs, intellectual property rights, reduction in overhead, and personnel requirements and must involve OSP. Researchers are urged to limit their commitments to defining specific tasks and project goals. Commitments of resources and final financial details must be cleared through the VPR and OSP.
- 5) Department Chairs, Deans, and Principal Investigators are NOT authorized to sign any award or funding agreement on behalf of the College.
- 6) Since all awards are contractual documents obligating the university to specific requirements and deliverables, ANY change in terms and conditions must be requested and negotiated through OSP and accepted by that office. Changes to existing agreements such as extensions in the period of performance (with or without cost), requests for budget adjustments, changes in principal investigator, addition or substitution of major labor categories, addition of deliverables, changes to intellectual property terms, or changes in the scope of work must be reviewed and submitted by OSP. This is as easy as telling your OSP administrator what changes you would like to make in the contract. OSP will work with the funding entity and if necessary will initiate conference calls with agency representative(s) to accomplish the requested adjustments. OSP will not authorize any changes that are not submitted and documented through this office.

We appreciate your cooperation. If you have any questions or concerns, please contact us.



Edit/Update the Proposal Routing and Review Form (1/5)

William & Mary Proposal Routing and Review Form

Please provide answers where indicated and provide all documentation requested.
Contact information for the Office of Sponsored Programs staff is [available here](#).

* Required fields

Proposal Profile

* Date Full Proposal Due:	<input type="text"/>	 click on the calendar icon or enter the date in this format (mm/dd/yyyy)
* Call title/solicitation number and/or web link.	<input type="text"/>	
Where did you hear about this opportunity?	<input type="text" value="Select..."/>	
* Project Title:	<input type="text"/>	
	<input type="checkbox"/> Add this proposal to the proposal library? Yes: <input type="radio"/> No: <input checked="" type="radio"/>	
* Proposed Start Date	<input type="text"/>	 click on the calendar icon or enter the date in this format (mm/dd/yyyy)

Investigators

* Principal	<div>To find a principal investigator, select their department from the first drop box, then click to highlight their name in the second drop box. Don't see the principal investigator that you need? Click here.</div> <div><input type="text" value="American Studies"/> <input type="text" value="Barnard, Timothy, Braxton, Joanne, M Gross, Robert, a"/></div>	
Co-principals	<div>Select the dept.: <input type="text" value="American Studies"/></div> <div>Use the arrows to add or remove items from "Selected Co-Pi's" list: Select Co-pi's name: <input type="text" value="Barnard, Timothy, Braxton, Joanne, M Gross, Robert, a"/> <input type="button" value="==>"/> <input type="button" value="<=="/> Selected Co-Pi's: <input type="text" value="Select to remove"/></div> <div>Don't see the Principal or Co-principal you need? Click the button. <input type="button" value="Add"/></div>	

* Funding Agency	<div>Highlight a selection by clicking on a funding agency in the list. <input type="text" value="4-VA 50in10 A&N Electric Cooperative"/></div> <div>Don't see the funding agency you need? Click the button. <input type="button" value="Add"/></div>
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<input type="radio"/> Yes <input type="radio"/> No	Could submission of this proposal place William & Mary in direct competition with the private sector in a manner which could be construed as unfair competition?
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<input type="radio"/> Yes <input type="radio"/> No	* Will this proposal involve multiple Departments and/or Centers? If so, each unit must approve the submission and allocation of the budget and F&A recoveries. Those allocation decisions will be documented, approved by the various departments, and included in the project files.
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<input type="radio"/> Yes <input type="radio"/> No	Fellowship: Is this an application to engage in a research project as an individual?
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Edit/Update the Proposal Routing and Review Form (2/5)

Project Type

- ☐ Basic Research Research undertaken primarily to acquire new knowledge without any particular application or use in mind.
- ☐ Applied Research Research conducted to gain the knowledge or understanding to meet a specific, recognized need.
- ☐ Development The systematic use of the knowledge or understanding gained from research directed toward the production of useful materials, devices, systems, or methods, including the design and development of prototypes and processes.

If the project will require any of the following, please identify the resources needed, their estimated costs, and explain plans to cover these costs.

<input type="radio"/> Yes <input type="radio"/> No	Are you requesting SSRL Top-off or salary support for sabbatical leave? Detail the anticipated time frame for the activity. <div style="border: 1px solid black; height: 60px; margin-top: 5px;"></div>
<input type="radio"/> Yes <input type="radio"/> No	Course Buyout If yes, funds should be requested in the budget for full salary and benefits of faculty being bought-out, not just the cost of an adjunct/visitor. Permission and amount must be approved by appropriate department Chair or Dean prior to submission of this proposal. <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div>
<input type="radio"/> Yes <input type="radio"/> No	Student Housing: 1.) How many students? 2.) How long? 3.) What years (e.g., Summer 20xx)? All requests for student housing must be approved by the Office of the Dean. <div style="border: 1px solid black; height: 30px; margin-top: 5px;"></div> Have you included a request to support the cost of student housing in the proposal budget? <input type="radio"/> Yes <input type="radio"/> No
<input type="radio"/> Yes <input type="radio"/> No	Matching Cost Share Are you requesting any matching/cost share to support this project? Is the cost share mandatory or voluntary? Please explain the amount requested and the source of funding. If you are requesting match, institutional approval must be received prior to proposal submission. <div style="border: 1px solid black; height: 30px; margin-top: 5px;"></div>
<input type="radio"/> Yes <input type="radio"/> No	Could this project result in special requirements for web page development/maintenance or public relations requirements? Will there be a need for a long-term maintenance? Who will be responsible for monitoring and supporting that maintenance? <div style="border: 1px solid black; height: 30px; margin-top: 5px;"></div>
<input type="radio"/> Yes <input type="radio"/> No	Will this project require space to house equipment or additional personnel, beyond what is currently available to you? 1.) Space to house equipment or additional personnel. If so, how much? 2.) Purchase of additional furniture or fixtures 3.) Require more than 1750 W (15 amps) of electrical power in an existing office area, or multi-phase electrical power 4.) Single-phase power of more than 5000 W in a laboratory 5.) Steam, cold water or hot water to operate new equipment 6.) Cryogenic fluids or solids (Dry Ice, Liquid nitrogen, argon) 7.) Narrow control of room temperature 8.) Vibration or acoustic or electromagnetic shielding or damping, or does any anticipated equipment exceed available floor weight loads? If yes, please provide description below: <div style="border: 1px solid black; height: 30px; margin-top: 5px;"></div>
<input type="radio"/> Yes <input type="radio"/> No	Will this project require additional IT resources? 1.) Procurement of servers, computers, specialized hardware or associated peripherals 2.) Procurement or development of standard specialized software applications or subscriptions. 3.) Use or integration of college data (student, finance, employees, other) and/or data collection from outside sources. 4.) Hiring technical positions such as developers, system administrators, data analysts, or other technologists? (If yes, please contact Information Technology)

Edit/Update the Proposal Routing and Review Form (3/5)

<input type="radio"/> Yes <input type="radio"/> No	Purchase (or maintenance) of equipment, apparatus, or furniture with funds not included in the proposal? Since this would require an extended commitment after conclusion of the proposed research, approvals by the appropriate administrators must be secured prior to the university's acceptance of an award. <input type="text"/>
<input type="radio"/> Yes <input type="radio"/> No	Will acceptance of this project require additional personnel costs? If yes, estimate amount and funding. <input type="text"/>
<input type="radio"/> Yes <input type="radio"/> No	Are graduate assistants budgeted?
<input type="radio"/> Yes <input type="radio"/> No	Is William & Mary tuition included? If so, indicate the amount and number of students. <input type="text"/>
<input type="radio"/> Yes <input type="radio"/> No	Are health and/or recreational fees included? <input type="text"/>
<input type="radio"/> Yes <input type="radio"/> No	Will William & Mary be responsible for administering subcontracts?
<input type="radio"/> Yes <input type="radio"/> No	Have you contacted collaborators to secure appropriate certifications, commitments, and signatures for submission with proposal? A proposal that includes a named subrecipient, subcontractor, or consultant will not be submitted without documentation confirming participation and the subrecipient's compliance with any funding agency requirements. <input type="text"/>
<input type="radio"/> Yes <input type="radio"/> No	Will any portion of sponsored activity take place outside of the United States? If yes, please list countries and purpose of travel. If so, is the anticipated travel detailed and included in the proposal budget? Note: For travel in some areas, you should notify and coordinate with the William & Mary Office of International Travel and Security, 221-1146. <input type="text"/>
<input type="radio"/> Yes <input type="radio"/> No	Will this project require the use of foreign currency?

Compliance Review

William & Mary Protocol and Compliance Management system is used for the electronic submission, approval, and tracking of research protocols. To access online forms and committee policies, log in to myWM and click on the Self Service tab.

Detailed information about various compliance requirements is available at:

<http://www.wm.edu/offices/sponsoredprograms/researchcompliance/guidanceandprocedures/index.php>

Once there, locate the Protocol and Compliance Management channel to access information.

<input type="radio"/> Yes <input type="radio"/> No	Will live vertebrate animals be used in this project? If so, a protocol must be submitted to the IACUC and an approval must be on file, prior to disbursement of funds. If you already have a protocol in place, please enter the number below. <input type="text"/>
<p>All PIs should strive to include the cost of animals and expendable animal care (feed, bedding, housing, enrichment) in their proposed budgets as necessary to conduct their research projects, unless the PI has made written arrangements with the home department in advance of proposal submission or has secured other funding sources in advance to cover the costs of animal care. If this project proposes to utilize VACU staff and/or VACU space, PIs must contact the Vertebrate Animal Care Unit (VACU) coordinator to determine space/staff availability and to estimate costs for expendable supplies.</p> <p>I have made arrangements to cover the costs of live vertebrate animal care for this project and I have consulted with the VACU regarding the availability of VACU staff and/or VACU space if the VACU will be used.</p> <p> <input type="radio"/> Yes <input type="radio"/> Not applicable </p>	

Edit/Update the Proposal Routing and Review Form (4/5)

<input type="radio"/> Yes <input type="radio"/> No	<p>Will this research or course involve the use of: a) recombinant DNA; b) infectious agents; c) wild-caught animals that may harbor infectious agents; or d) any human fluid or tissue? If so, a protocol must be submitted to the IBC and an approval must be on file, prior to disbursement of funds.</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>
<input type="radio"/> Yes <input type="radio"/> No	<p>Will this project involve any research activities (such as surveys or testing) which must be reviewed by William & Mary Protection of Human Subjects Committee? If so, a protocol must be submitted to the appropriate Institutional Review Board (PHSC, EDIRC, Student IRB) and an approval must be on file, prior to disbursement of funds.</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>
<input type="radio"/> Yes <input type="radio"/> No	<p>Is there any planned or potential use of hazardous agents (ie infectious agents, toxins, mutagens, carcinogens, or explosive chemicals) or government identified select agents? Contact the Environment, Health and Safety Office at (757) 221-2146. If you have already contacted the EHS Office, please indicate in the text box below:</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>
<input type="radio"/> Yes <input type="radio"/> No	<p>Is there any planned or potential use of radioactive materials? If yes, you are required to notify the Institutional Radiation Safety Officer at 221-2220 to obtain the necessary isotope and protocol approvals. OSP requires confirmation by the RSO of the receipt of this form prior to final proposal submission. Radioactive Materials License#: <div style="border: 1px solid black; width: 150px; height: 15px;"></div> Issued to: <div style="border: 1px solid black; width: 150px; height: 15px;"></div> (You must be a license holder or authorized under a current license)</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>
<input type="radio"/> Yes <input type="radio"/> No	<p>Will this project require training for Responsible Conduct of Research?</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div> <p>Please indicate if this proposal intends to fund conferences, workshops and/or symposia supported by an NSF or NIH award</p> <p> <input type="radio"/> Yes <input type="radio"/> No </p> <p>The National Science Foundation (NSF) will not tolerate sexual harassment, other forms of harassment, or sexual assault, within the agency, at awardee organizations, field sites or anywhere science or education is conducted. https://www.nsf.gov/od/odi/harassment.jsp https://www.wm.edu/offices/sponsoredprograms/researchcompliance/nsf_supported_conferences_workshops_symposia/index.php </p>
<input type="radio"/> Yes <input type="radio"/> No	<p>Does the Principal Investigator or other key personnel on this project have any current or pending obligations which could create a conflict of interest if this proposal is funded? If yes, please contact Office of the Vice Provost for Research and Graduate Studies at (757) 221-2573.</p> <p><i>Involvement in multiple sources of funding, whether federal or private, brings with it the possibility of conflicting contractual obligations. Examples might include ownership of research data, copyrights, patents, the use of proprietary information, the use of equipment, or private consulting activities.</i></p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>
<input type="radio"/> Yes <input type="radio"/> No	<p>Would acceptance of this award result in potential data or publication restrictions? If yes, please contact Technology Transfer Office (757) 221-1751.</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>
<input type="radio"/> Yes <input type="radio"/> No	<p>Will this work require initiation or use of a Material Transfer Agreement or licensing agreement? Will there be an exchange of proprietary information? If yes, contact Technology Transfer Office (757) 221-1751</p> <div style="border: 1px solid black; height: 30px; width: 100%;"></div>

Edit/Update the Proposal Routing and Review Form (5/5)

<input type="radio"/> Yes <input type="radio"/> No	<p>Will this project potentially result in the development of intellectual property or a patent? If yes, notify the Director of Technology Transfer, 221-1751. All employees are subject to the College's Policy on Intellectual Property. An investigator cannot, on his/her own assign ownership rights of intellectual property to a third party without approval of the College. Ownership of intellectual property from non-federal projects will be determined in the agreement between the College and the sponsor. The College owns any intellectual property resulting from a federally-funded project. Employees must disclose any inventions promptly and cooperate in the preparation and filing of patent applications. Rights to an invention resulting specifically from federal funds may not be assigned without approval from the federal agency and the College.</p> <div></div>
<input type="radio"/> Yes <input type="radio"/> No	<p>Will your research involve any materials, technology, or services listed on the EAR/Commerce Control List or the ITAR/U.S. Munitions List or include work with a nation on the US Sanctions list? If so, or if you are not sure at this point in the application process, please complete this form and submit to the Export Control Officer.</p>

TRAINING REQUIREMENTS: The College has training materials for all mandatory compliance requirements posted at:
<http://www.wm.edu/offices/sponsoredprograms/researchcompliance/guidanceandprocedures/online/training/index.php>

NOTE: Research accounts will not be established until all required protocols are submitted and training has been completed.

I agree to accept responsibility for scientific conduct of the project and to provide the required progress reports and other mandatory information to the funding entity if this proposal is funded. Further, I agree to abide by all institutional and funding agency requirements. My submission of this form serves as a certification that all information submitted within this application is true, complete, and accurate to the best of my knowledge.

Sends the data to OSP

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Does OSP Need to Sign/Approve?

Document Type	Short Answer	Explanation
White Paper/Concept Note	No	OSP should only sign if the sponsoring agency requires official institutional endorsement. If endorsement is required, submit a R&R Form
Full proposal	Yes, but...	In 95% of cases, OSP needs to sign/submit a full proposal. Few exceptions for foundations. In all cases a R&R form should be submitted.
Agreement	Yes	OSP houses the institution's Authorized Official so any research agreement must be approved and signed by OSP even if it is addressed to a PI.
Award revisions: Scope change, budget alterations, key personnel substitutions, etc.	Yes	If a revised budget has been requested by the sponsor prior to funding (ex: NSF) OSP will need to route and submit. If scope changes have been suggested (expansions, substitutions, reductions), thus must be formalized in an award revision by both the agreement officer and OSP, not just the program side. Key personnel changes (new individual or effort reduction >25%) require authorization by the funding agency and must be coordinated through OSP.
Personnel Action Form	Yes, when...	An index beginning with a 7 and/or 4 is to be charged. We don't sign off in E&G funds or 14 accounts.
BuyW&M order	Yes, when...	An index beginning with a 7 and/or 4 is to be charged.
Student Salary Form	Yes, when...	An index beginning with a 7 and/or 4 is to be charged. We don't sign off in E&G funds or 14 accounts.
Travel Authorization	Yes	When charging to a 7 and/or 4 index we must approve travel prior to departure.
Travel Exp. Reimbursement Voucher	No, but...	If a travel authorization has been signed prior to departure, OSP does not need to sign. If no authorization has been obtained for charges against a 7 and/or 4 index, we must review and sign off on the entire TERV.
Contractor Payment	Yes, when...	An index beginning with a 7 and/or 4 is to be charged.
Individual Reimbursement Request*	Yes, when...	An index beginning with a 7 and/or 4 is to be charged.
BoA Credit Card Statements	Yes, when...	An index beginning with a 7 and/or 4 is to be charged.
Journal Voucher	Yes, when...	An index beginning with a 7 and/or 4 is to be charged.
HR Redistribution Worksheet	Yes, when...	An index beginning with a 7 and/or 4 is to be charged. (Notice a pattern?)

*Accounts Payable is doing away with personal reimbursements except in extraordinary circumstances.