## **Financial Status Reporting and Monitoring**



Policy Number: 900-001 Effective Date: June 14, 2025 Last Updated: June 14, 2025

**Issuing Authority:** Office of Research, Office of Sponsored Programs

**Responsible Officer:** Vice President of Research

### Scope:

It is the policy of Howard University (herein referred to as "Howard" or "University") to have in place written policies and procedures ("Policies and Procedures") to safeguard and maintain effective internal controls for monitoring and reporting on sponsored award finances.

This policy is issued to set the expectations for proper financial monitoring and reporting for sponsored projects, including reinforcing roles and responsibilities for individuals involved in the process. This policy is also issued to conform to OMB Uniform Guidance for Federal Financial Assistance (2 CFR 200, Uniform Guidance).

This policy applies to faculty and staff of the University including all colleges and schools of Howard University; Howard University Hospital, WHUR (Radio Station); WHUT (Television Station); Howard University International (HUI) the Office of Procurement and Contracting, Research Administrative Services, the Office of Research Development, and the Office of the Controller.

#### **Policy:**

Howard University must comply with federal and other sponsoring agencies' requirements concerning financial monitoring and reporting. Sponsored awards require interim and final financial reports to demonstrate whether the sponsored award was expended properly, and costs appear reasonable based on the scope of work performed as described in the final technical report or other deliverables.

For cost-reimbursable agreements, the final financial closeout is typically the last opportunity to reconcile the project costs and invoice the sponsor for the remaining costs incurred. For fixed-fee-for-service agreements, the final financial closeout provides an additional opportunity to examine project-related costs to revenue in order to determine whether there are any remaining unexpended funds and determine the appropriate actions for those funds (i.e. retain or refund based on award terms and conditions). An important focus of the closeout process is for the University to submit financial reports to the sponsors that:

- Accurately reflect the use of sponsored funds as recorded in the financial records of the University; and
- Comply with the sponsor's terms and conditions incorporated in the award; and
- Are consistent with the approved award budget.

A sponsored project must be properly closed out after it expires to ensure that final

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expenditures are allowable, encumbrances are liquidated, payments have been received, reports have been submitted, the budget agrees with expenditures, and the results of that reconciliation are reported to the sponsor via the final financial report. Refer to the terms and conditions of the award notice and sponsor guidelines for project-specific final financial reporting requirements.

### **Roles and Responsibilities:**

## **Sponsored Projects Office (SPO)**

- Reviews all award attributes in Workday to ensure they align with award terms and conditions.
- Notifies PI and Department Administrator prior to the award end date to remind them the award is ending.
- Prepares draft financial reports based on expenditure information in the billing module within Workday.
- Reviews awards for unallowable costs, overdrafts, and remaining balances.
- Reviews facilities and administrative and fringe charges.
- Prepares and approves the interim and final financial reports or invoices and submits them to sponsors.
- Notifies departments of the date the final financial report or invoice was submitted to the sponsor to facilitate and comply with the University's Record Retention policy.
- Tracks outstanding receivables and sends out past-due notices.
- Adjusts funding in Howard's financial systems to match final reported costs.
- Facilitates the settlement of closeout issues and uncollectible funds.
- Closes the project cost centers once all financial obligations have been satisfied.
- Maintains financial records according to sponsor and University Records Retention Policy.
- Coordinate financial audits of sponsored projects by federal or external auditors.

### Principal Investigator/Project Director (PI/PD)

- Reviews the monthly Grant Management Report (GMR) with their Research Analyst to confirm financial records accurately reflect the use of sponsor funds.
- Ensures expenditures are in compliance with the terms and conditions of the sponsored award and University policy.
- The PI has discretion to determine allocability of charges and may request cost transfers as required and are consistent with university policy. (See HU policy on Cost Transfers)

### **Controller's Office**

• Prepares the Schedule of Expenditures of Federal Awards (SEFA).

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## **Financial Reporting:**

- The sponsored project Grant fund will be reconciled to ensure that expenditures, revenue, invoicing and cash received are in balance per the award type (i.e. cost reimbursable agreement vs. fixed-fee-for-service agreement).
- Interim and final financial reports are prepared and submitted by SPO Post-award and are based upon the general ledger from the University's system of record (exceptions would include milestone-based projects where payments are tied to deliverables). Award expenditures are pulled from the billing module in Workday.
- The interim and final financial reports are submitted in the format prescribed by the terms of the award and within the prescribed due date.
- Some sponsors allow for revised final financial reports to claim additional costs; the University will use discretion on a case-by-case basis to determine the appropriateness and material impact of claiming additional costs after final financial report submission.
- Federal sponsoring agencies, and other sponsors of cost-reimbursable agreements, require
  applicable credits to be applied to sponsored project Grant funds. SPO Post award will
  process refunds where applicable when applicable credits arise after the final financial
  report has been submitted.
- Prepared by the Controller's Office, The Schedule of Expenditures of Federal Awards (SEFA) is an annual federally required report that is a supplemental schedule to the audited financial statements that determines the applicability and scope of the Single Audit (<u>Uniform Guidance 2 CFR 200.501</u>).
- Expenditures included in the SEFA reference Grants, Cost-based Contracts under Federal Acquisition Regulations (FAR), Cooperative Agreements, Direct Appropriations, HEERF, Cares Act, Provider Relief Funds, etc.

### Forms and Links:

Office of Research Ticketing System