

## **Sponsored Programs Post Award Management Procedures**

Effective: 2022.09.01

### **I. Purpose**

These procedures are specifically established to facilitate the **post-award phase** of a sponsored project. During the post award phase, Universidad del Sagrado Corazón (hereafter Sagrado) is responsible for monitoring and assisting in the implementation, reporting and closeout, both fiscally and programmatically of the sponsored project. Post award management therefore will oversee a project's fiscal and programmatic accountability and compliance as a grantee with a sponsoring entity. Once a proposal is approved by a grantor entity, it becomes a Sagrado sponsored project, and the Office of Grants and External Resources (OGER) is immediately activated in post-award oversight. OGER will be available to assist or guide in resolving any areas that a Principal Investigator or Project Director (PI/PD) may need sponsoring entity clarification on.

The post-award process officially begins when the pre-award process<sup>1</sup> is completed and after a formal proposal is submitted by OGER, on behalf of Sagrado, to a sponsoring entity, and either a Grant Award Notice (GAN) or Notice of Award (NOA) is issued or a notification of decline or not funded is received. The completed application package and the official grantor's response are then uploaded to electronic file drive as custodian of the records.

### **II. Applicability**

Once a GAN is received at Sagrado, the following procedures are adopted in support of the Policy for Proposal Development and Project Implementation of Sponsored Projects and will be used for the implementation of projects sponsored with external funds or resources, regardless of their origin (federal funds, foundations, or industries, among others); except for those classified as donations.

### **III. Procedures**

#### **A. Grant Approval & Acceptance Process**

The objective of the grant approval process is to assess the applicability of the approved project as submitted to the sponsoring entity given that many times a period of 180 days, on average, has elapsed from submission until approval, and conditions may have changed since submission. During this stage, the grant agreement terms and conditions, the University's capability to comply with the project, and possible

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<sup>1</sup> Please refer to the [Policy and Procedures for Proposal Development](#) .

programmatic and financial modifications are reassessed from the conditions prevalent during the pre-award stage.

1. The GAN will generally be issued in one of the following formats. A Project cannot begin implementation without an officially signed GAN:

<b>Type of Award</b>	<b>Definition</b>
Contract	Signed by two (2) parties. Creates a “vendor” relationship.
Cooperative Agreement	Signed by two (2) parties or only by sponsoring entity. Major oversight and decision authority retained by sponsoring entity.
Grant	Usually signed only by sponsoring entity. Outright funds for project implementation by grantee.
Subaward/Subrecipient	Signed by two (2) parties. Authorizes the pass through of mainly federal funds through a pass-through entity (PTE) or grantee. The Subawardee or Subrecipient is third party.
Memorandums of Understanding (MOU) or Agreement (MOA)	Signed by two (2) parties, like contract, but no “vendor” relationship is established; hence, decision-making authority is retained by both parties.

2. When a GAN is received, the OGER Post Award Manager will verify:
  - a. The project’s documents as described in the submitted grant application’s package.
  - b. Project’s Executive Summary or Abstract – this summary will be available for public dissemination purposes, in coordination with Sagrado’s Integrated Communication Office.
  - c. Project’s annual workplan, describing the projects’ key performance goals, objectives, indicators, and all reporting deadlines (fiscal and programmatic).
3. The GAN will be generally emitted in some type of electronic platform (i.e., electronic systems such as e-Grants, research.gov, NIH Commons, HRSA EHBs, or G5, among others) or by email.
  - a. GANs are issued to two (2) persons at Sagrado, the President or his/her Authorized Organizational Representative (AOR), preferably the OGER Director (see Attachment 1 for OGER contact information); and, the Principal Investigator (PI) or Project Director (PD), jointly referred to as PI/PD.
  - b. The GAN will be revised by the PI/PD and the OGER Director for concurrence prior to recommending award acceptance and the President’s signature, if necessary. The President is the only person authorized to sign on behalf of the

University when a signature is required unless another University Officer is properly authorized in accordance with the University's policies and procedures. The sponsoring entity will usually establish the timing for acceptance and signing, but if no specific timeframe is set by the sponsoring entity, the process will be expedited by OGER in a timely manner.

- c. The OGER Director may request review of the GAN from other University areas as deemed necessary prior to recommending its acceptance. This may include, but is not limited to, Finances, Compliance, Operations, IT or Human Resources. Any recommendations or observations will be made in writing (email) to the PI/PD and OGER Director, for corresponding action.
  - d. Once the GAN has received concurrence to proceed, the OGER Director will recommend and obtain the President's signature, if necessary.
  - e. The OGER Director, as AOR, or the PI/PD as required by the sponsoring entity will forward the signed GAN, if required, to the appropriate entity contact. Any document with original signatures will be under the custody of the unit that generated the proposal or the unit responsible for implementing the approved project. OGER will retain a copy of the signed GAN in its electronic files.
4. With a duly approved or signed GAN, the Post Award Manager will schedule and conduct an Induction Meeting with the PD/PI to discuss the new project, the grant agreement (GAN) conditions, projects details, needs, recruitment requirements, budget details, and any warranted modifications, as necessary. The results of the meeting will be documented and retained at OGER's project electronic file system.

## **B. Project Files**

Once a grant is approved, OGER will create a centralized post award management tracking system for the project based on the Proposal ID created during the pre-award stage (see Procedure for Proposal Development<sup>2</sup>). Post Award Management sub-folders will be opened for each project account by project year of implementation.

1. Create a post award account folder in OGER's electronic repository shared system as follows:
  - a. Proposal/Project ID number. Format: YY-MM-### (YY for fiscal year; MM corresponding to month [01-12]; and ### corresponding to serial numbers [001-999]).
  - b. Documents uploaded must be complete and comply with all policies, procedures and forms established by Sagrado and verified in accordance with the proposal application package.

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<sup>2</sup> Please refer to the [Policy and Procedures for Proposal Development](#) .

- c. OGER will create the following sub-folders in the Post Award Project File:
  - i. Grant Award Notice (GAN)
  - ii. Correspondence with Sponsoring Entity
  - iii. Internal Correspondence
  - iv. Programmatic Matters & Reporting
  - v. Fiscal Matters & Reporting
  - vi. Other.

## **IV. Project Implementation**

### **A. Annual Work Plans**

1. OGER will require sponsored projects to develop an annual workplan with sufficient detail to implement day-to-day activities of the sponsored project.
2. The work plan, in addition to including programmatic activities, should address activities related to recruitment, reporting, and evaluation.
3. In addition to activities, the workplan should identify person(s) or other institutional units responsible for implementation, the start and end dates of the activity(ies), and additional comments as necessary to understand the activity.
4. Work plans are subject to change; hence, the PI/PD should update the work plan as necessary at least on a quarterly basis. Major changes, consisting of modifications in deliverables, objectives, or changes in time and effort commitment must be approved by the corresponding head of the organizational unit where the project is located (specifically Deans and Vice presidents). Any change in time and effort of more than 25% requires prior approval from the sponsoring entity. All changes must be informed to OGER.
5. OGER will provide work plan templates, as needed, or requested by the PI/PD.

### **B. Sponsored Project Programmatic Reporting**

1. All sponsored projects will require programmatic reporting. Reporting requirements are usually included in the GAN under terms and conditions.
2. Reporting requirements will be discussed between the OGER Post Award Manager and the corresponding PI/PD, and/or PI/PD official representative during each sponsored project induction meeting.
3. A reporting schedule will be developed, maintained, and updated by the Post Award Manager. This schedule will apply to all Sagrado sponsored projects.

4. Once the reporting schedule is established, the Post Award Manager will program on the different institutional calendars' reminders of report due dates, at least 30 days before the required report submission date. These reminders will be sent to the PI/PD, the PI/PD's supervisor, the corresponding institutional unit's Vice President, the Grants Manager (as applicable), the Sponsored Projects accountant, and the Director of OGER.
5. Programmatic reports will be sent to the Post Award Manager at least ten (10) days prior to the corresponding submission date for revision. Other arrangements may be established on a case-by-case basis, prior approval by OGER.
6. The Post Award Manager will review the corresponding project report for accurateness and compliance with proposal commitments and outcomes.
7. Once reviewed, the programmatic report will be forwarded to the OGER Director, for a final review. Any comments needed to be addressed or revisions required will be requested from the PI/PD at this point in the revision process.
8. Once comments are addressed and reviews/revisions accepted, the PI/PD will assure approval of report content by their supervisor, and the Vice President or delegate of the institutional unit to which the sponsored project is ascribed to. Approval by email addressed to the PI/PD and OGER is the recommended form.
9. Once the programmatic report is approved by the PI/PD and their supervisor, OGER will seek final approval of the report and authorization to submit from the Office of the President.
10. Upon receiving authorization to submit from the Office of the President, OGER will inform the sponsored project's PI/PD to submit.
11. The PI/PD, or designee, must provide OGER evidence of report submission within 24 hours. This evidence will be filed in the corresponding project file held by OGER.

## **V. Coordination with the Office of the Vice President of Finance**

Finance and accounting coordination consists of the provision of technical assistance for the appropriate management of sponsored funding and resources from the financial perspective. As such, OGER will serve as the liaison between sponsored projects and the Finance Office, which is Sagrado's organizational unit with all fiscal responsibility of any sponsored project.

## **A. Sponsored Project Account Opening or Update**

1. Once a grant is approved, OGER will coordinate with the PI/PD, and/or the project's grant manager/analyst to develop the request for opening a Project Account in Sagrado's financial management system. The Excel file titled "Account Opening/Update Form", which can be downloaded [here](#), includes the template that will be used for said purposes. Each budget period will consist of a maximum of 12 months. This file consists of three (3) worksheets.

The first worksheet titled "Request for Project Account" will include the following information:

- a. Name of the recommended Fiscal Officer (must be PI/PD) and Initiator.
- b. Total recommended budget for the corresponding project period, not to exceed a period of 12 consecutive months (in some instances, and as authorized by a sponsoring entity, the budget for a specific project year can contemplate the use of "carry over" or "carry forward" funding).
- c. Distribution by object code (according to Sagrado's Chart of Accounts).
- d. Distribution of funding by month.

The content of the spreadsheet will be provided by the corresponding project personnel and will be verified by the OGER Post Award Manager.

The other two (2) worksheets included on the "Account Opening/Update Form" correspond to the proposal's submitted budget and fringe benefits details. These are copied and inserted into the "Account Opening/Update Form" from the "Sagrado Budget Worksheet Template" developed for the approved proposal during the pre-award stage. This latter Excel file can be downloaded [here](#).

2. The "Account Opening/Update Form" must be completed for each project year at the beginning of each award cycle. The account is opened during the first budget cycle. The account is updated thereafter on an annual basis. For example, if a project starts on October 1<sup>st</sup> and has a 5-year project duration, this form will be completed five (5) times during the project's effectiveness. The "Account Opening Form" must be completed and submitted to the Finance Division no later than thirty (30) days from the start of each budget cycle.
3. Once the "Account Opening/Update Form" is completed, the PI/PD, and/or the project's grant manager/analyst will sign the form electronically and forward it to the OGER Post Award Manager. The form must also be accompanied by the documents included on the following list.

- a. “Disclosure of Conflict of Interest (COI) Form” (electronic or hard copy) completed annually by each project personnel, in compliance with Article IX. Conflicts of Interest, of the policy entitled “University Code of Ethical Conduct”<sup>3</sup>. This is necessary to establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain. It is the responsibility of the PI/PD to maintain COI Forms updated.
  - b. “Cost Share Certification Form” (as applicable), to confirm that funds are available for cost sharing as committed or providing an alternate source of funding to meet the commitment, if adequate funds are not available. The form must identify amount of cost share by source (third-party cost share commitments). If from a Sagrado source, the corresponding account number must be provided if the cost share is in cash.
4. The OGER Post Award Manager will verify upon receipt of IV.A.3. above, all documentation for accuracy and completeness.
  5. Once certified as complete, the Post Award Manager will forward to the Finance Office, a request for the opening of new account for the entire project period (total number of years to be sponsored), accompanied by the documents mentioned in IV.A.3, and the:
    - a. Grant Award Notice (GAN)
    - b. Approved Final Proposal
    - c. “Disclosure of Conflict of Interest (COI) Forms”
    - d. “Cost Share Certification Form” (as applicable).
  6. The responsible staff member at the Finance Office will proceed to review the budget detail and if any questions arise, contact the PI/PD by email, for review or clarifications prior to opening the account in the financial management system. Accounts will be opened by budget cycle periods. OGER will be available to assist the PI/PD, Grant Manager or Budget Analyst in resolving any issues, as needed.
  7. Once the corresponding project account is opened, the Finance Office will inform the PI/PD, and/or the project’s Grant Manager or Budget Analyst that an account has been opened, detailing account number, accesses, and privileges to the account (Initiator and Fiscal Agent for the account).
  8. Updates to an existing account will be necessary for each new funding cycle or the addition of any supplemental funding received during a funding cycle,

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<sup>3</sup> [University Code of Ethical Conduct](#)

following steps IV.A.1.b-d, herein. The same applies to any reduction of funds during a specific funding cycle.

9. Any new funds authorized within the GAN (new funding cycles and/or supplements) must follow steps IV.A.1.b-d herein, as applicable. The Finance Office is the only institutional unit authorized to allocate new funds into an open account.
10. When “carry forward” or “carry over” funds are authorized, funds can be distributed in the account by the authorized fiscal officer, only after receiving approval from the sponsoring entity. If support is needed to execute this process, the Finance Office should be contacted. A copy of the official authorization of carry forward or carry over funds, in the form of a letter or email, must be sent to both the Finance Office and OGER.

## **B. Sponsored Project Shadow Accounting**

1. The “Shadow Accounting File” is an Excel document developed by OGER that has the purpose of keeping two sets of accounts for strengthening sponsored project activities incurred at the project level. This Excel file can be downloaded [here](#). The term “shadow accounting” refers to a set of records maintained at a local or departmental level – independent of the centralized “system of record” maintained by the larger institution or Sagrado’s current financial management system. The Shadow Accounting File is a tool to facilitate daily fiscal operations by sponsored projects outside of the Sagrado financial system. This tool will be the project’s daily budget ledger and used for reconciliation purposes with Sagrado’s current financial management system.
2. The Post Award Manager will develop the sponsored project’s Shadow Accounting File, aligned with the recommended budget established in the process of Sponsored Project Account Opening.
3. Each “Shadow Accounting File” will be developed for a period not to exceed twelve (12) months.
4. The structure of the file includes the following worksheets:
  - a. Variance Report
  - b. Nine (9) sheets aligned with the budget categories included on the Standard Form 424 (SF-424) available at <https://apply07.grants.gov/apply/forms/sample/SF424A-V1.o.pdf>. The “Shadow Accounting File” will only include those sheets aligned with the approved budget by the sponsoring entity. (Note: This a standard federal form that can be applied to all sponsored projects irrelevant of the source of funding).



- c. The project's approved budget and a sheet for Fringe Benefits calculations.
5. Each sponsored project will designate a person responsible for the "Shadow Accounting File" management and daily maintenance, preferably the Project Director (PD) or Principal Investigator (PI), the sponsored project's Grant Manager or Budget Analyst or equivalent, or the sponsored account initiator as designated by the corresponding work unit.
6. The person responsible for the "Shadow Accounting File" management and daily maintenance will document all financial transactions in the "Shadow Accounting File" as expenses are incurred (encumbered) and by budget object codes.
7. The person responsible for the "Shadow Accounting File" management will meet at least twice a year (i.e., at least at six [6] months intervals) with the External Resources Accountant from the Finance Office to reconcile the Shadow Accounting File with the allocations in Sagrado's financial management system. It is highly recommended that a reconciliation be performed at least thirty (30) days prior to the closing of any official Sagrado fiscal year (June 30<sup>th</sup>).
8. It is responsibility of OGER to train designated personnel (i.e., Project Director (PD) or Principal Investigator (PI), or Grant Manager or Budget Analyst or equivalent, or sponsored account initiator as designated by the corresponding work unit) on the proper use of the "Shadow Accounting File".
9. Any error(s) detected or incurred within the programming of the "Shadow Accounting File" must be informed to the OGER Post Award Manager and/or Director for review and correction. Errors in entries, amounts, or other mistakes are the responsibility of the person assigned to manage the File and will be detected and corrected accordingly or through the reconciliation process.

### **C. Sponsored Project Fiscal Reporting**

1. All sponsored projects will require fiscal reporting in some way or another. Reporting requirements are usually included in the GAN under terms and conditions.
2. Reporting requirements will be discussed between the OGER Post Award Manager the corresponding PI/PD, PI/PD official representative (as applicable), and the sponsored projects accountant (Accounting Division of the Office of Finance) during each sponsored project induction meeting.
3. A reporting schedule will be developed, maintained, and updated by the Post Award Manager. This schedule will apply to all Sagrado sponsored projects.

4. Once the reporting schedule is established, the Post Award Manager will program on the different institutional calendars, reminders of report due dates, ten (10) days before the required report submission date. These reminders will be sent to the PI/PD, the PI/PD's supervisor, the institutional unit's Vice President, the Sponsored Projects accountant, the Comptroller, and the Director of OGER.
5. To complete fiscal reports, all budget balances must be certified by the Accounting Division and/or Comptroller. OGER will request from the Accounting Division a balance certification from the financial management system at least seven (7) days prior to the corresponding submission date. Preliminary balances will be certified by the Accounting Division and/or Comptroller within 48 hours and sent to the PI/PD and sponsored project's initiator, budget analyst or equivalent, and OGER Post Award Manager and Director.
6. Sponsored project personnel will reconcile its "Shadow Accounting File" with the preliminary balances submitted by the Accounting Division and the Sponsored Projects accountant. Any differences between the financial management system balances and the project's "Shadow Accounting File" will be discussed among the PI/PD, Grant Manager, Budget Analyst or Initiator, and the Sponsored Projects Accountant.
7. Once the sponsored project's budget balances have been reconciled, the PI/PD must certify budget accurateness prior to fiscal report submission, and inform OGER and the Office of Finance, confirming order to proceed.
8. The sponsored project's fiscal report can only be submitted by the Comptroller or his/her delegate, unless the sponsoring entity indicates differently. No sponsored project can submit a fiscal report without the official certification from the Comptroller.
9. The Comptroller will provide the PI/PD and OGER evidence of report submission within 24 hours. If the project submits the fiscal report, the project will provide evidence of report submission to the Accounting Division, Comptroller and OGER also within 24 hours of report submission. This evidence will be filed in the corresponding project file held by OGER.

#### **D. No-Cost Extension Request**

A no-cost extension (NCE) extends the project performance period without additional sponsor funding. An NCE request is made to allow additional time to complete project objectives and must not be exercised merely to use unobligated balances in funds. Requests are generally made in 12-month periods.

To request an NCE, the PI/PD must initiate the following process at least twenty (30) days prior to the original award expiration date (unless the sponsor requires an earlier date):

1. Validate with the Finance Office the amount of remaining funds for the NCE period.
2. Develop a brief justification letter describing the reason for the request, project progress, and pending activities. This letter should also include a budget justification on how the remaining funds will be spent.
3. Submit the request and other supporting documents to the Post Award Manager for revision.
4. The Post Award Manager will review the NCE request for compliance with sponsor requirements. Any comments or required revisions will be discussed with the PI/PD.
5. Once reviewed, the NCE request will be forwarded to the Vice President of the corresponding institutional unit and the Finance Office for a final review and approval.
6. Once the Finance Office authorizes the NCE request, OGER will inform the PI/PD to submit the request to the Program Officer.
7. As per 2 CFR 200, NCE requests must be submitted to a sponsoring agency at least ten (10) calendar days before the end of the project period unless otherwise specified in the award's terms and conditions.
8. The PI/PD must provide OGER evidence of NCE request submission within 24 hours.
9. Upon receiving the revised Notice of Award, the PI/PD must submit it to OGER along with the documents specified in the Sponsored Project Account Opening section (Section V. A.).

## **VI. Coordination with the Office of Organizational Development and Human Resources (ODHR)**

Human Resources (HR) coordination consists of providing assistance to sponsored projects based on personnel activities that entail matters related to compensation (salaries and fringe benefits), descriptions of roles and responsibilities, and compliance with applicable human resources related policies and regulations. HR coordination is not related to contracting activities for professional services. The latter is coordinated through the Office of Compliance, Auditing, and Institutional Integrity.

1. The Post Award Manager will schedule a meeting with the ODHR team and the PI/PD to discuss the requirements for the recruitment of any new employees included in the sponsored project.
2. The PI/PD will develop a job description for any new project position for which ODHR does not have one established. Final approval of the job description is the responsibility of Human Resources, as well as the establishment of the appropriate pay rate.
3. ODHR, in collaboration with PI/PD, will establish a calendar for the recruitment processes of required personnel, in compliance with Sagrado HR protocols. If the recruitment entails a new or vacant faculty position, the Office of Academic Affairs must also be included in the process. Sagrado HR protocols are in compliance with Equal Employment Opportunity (EEO) and Americans with Disabilities Act (ADA). These can be found in the policy entitled “Policy for the Recruitment of Administrative Personnel” or the “Faculty Manual” (as amended).
4. Once any personnel interviews and recommendations have been made, only the Office of Organizational Development and Human Resources is allowed to make an official employment offer to the selected candidate(s).
5. ODHR will notify the PI/PD and appropriate leadership that interviews were completed and that they made the official offer (preferably in writing) and the applicant’s initial response with planned next steps and if possible scheduled start date. This will allow the PI/PD to plan forward and prepare a work plan for the arriving team member.
6. All positions to be recruited under a sponsored project must have the approval of the PI/PD, and the consent of their supervisor, and the lead or delegate of the institutional unit to which the sponsored project is ascribed to (Deans, Provost Office, Student Affairs, or any other organizational office head).
7. Vacancies in a personnel position in any sponsored project must follow steps 3 – 5 above for recruitment.
8. Vacancies to PI/PD or Co-PI/Co-PD positions will follow steps 3 – 5 above, but prior to the Office of Organizational Development and Human Resources is allowed to make an official employment offer to the selected candidate, OGER must request prior approval from the sponsoring entity if the vacancy is in the PI/PD position; and the PI/PD must request prior approval from the sponsoring entity if the vacancy is in the Co-PI/Co-PD position.

## **VII. Coordination with the Offices of Operations and Integrated Technology and Information (ITI)**

Coordination with Operations and ITI is essential for any sponsored project, particularly for assuring adequate space for the sponsored projects operations (as needed), or when

new construction, remodeling or refurbishment of facilities is necessary, as per approved by the sponsoring entity.

1. The Post Award Manager will schedule and conduct an induction meeting with the PI/PD, and personnel from Operations and ITI to discuss requirements included in the sponsored project, as applicable, related to:
  - a. Design & Engineering
  - b. New Construction
  - c. Space remodeling or refurbishment
  - d. Technology platform acquisition, updates and/or access.
2. A timeline for any proposed construction work included in the sponsored project will be developed by the PI/PD in collaboration with the Office of Operations.
3. The timeline will be shared with the Finance Office and OGER given procurement requirements that must be implemented according to Sagrado's Procurement Policy and Procurement of Goods and Services Procedures.
4. It is the responsibility of the PI/PD, in collaboration with the Vice President of Operations, and the consent of PI/PD supervisor, and the lead or delegate of the institutional unit to which the sponsored project is ascribed to (Deans, Provost Office, Student Affairs, or any other organizational office head) to oversee all construction and remodeling work undertaken with external funds.
5. An official request will originate from PI/PD to the Vice President of Operations detailing a concise written draft work order that outlines the items required in support of the sponsored project and the required timeline, as approved on the sponsored project. The Office of Operations will then develop the official work order for the sponsored project, meet with the PI/PD for concurrence, and then sign-off on the proposed work order, which will then be added to Sagrado's capital improvement plans. This work order must detail the budget approved by the sponsored project for its development.
6. No construction work can begin until the PI/PD signs-off on the work order and concurrence has been met on the work to be developed. The Office of Operations will have the final say on all construction matters as it is this unit's responsibility to safeguard all construction projects and align with Sagrado's capital improvement plans. The work order is understood to have all deliverable requests that are possible based on existing environmental, structural, or institutional limitations or guidelines.
7. Prior to the acquisition of any computer equipment or peripherals, including software, the PI/PD will request from the Chief Information Officer (CIO), with a

copy to OGER, any required specifications necessary to assure compatibility with current Sagrado technology platforms. The consent of the PI/PD supervisor and the University officer responsible for the institutional unit to which the project is ascribed, as per the official designation of University Officers, will also be required.

8. Furthermore, if new computer equipment or technological support equipment will be procured, the PI/PD, the Office of Operations, and ITI must meet to determine any requirements prior to installation, such as electrical or computer connections or drops. These costs must be identified within the budget of the sponsored project.

## **VIII. Project Closeout**

Project Closeout represents the grant ending process and is required for all federally funded sponsored projects as per the Federal Office of Management Budget (OMB) Uniform Administrative Requirements §200.344. The OGER Post Award Manager will assist and support PI/PDs in submitting the final financial and programmatic reports.

1. According to the §200.344 (a), the recipient (Sagrado in this case) must submit, no later than 120 calendar days after the end date of the period of performance, all financial, performance, and other reports as required by the terms and conditions of the Federal award. The Federal awarding agency or pass-through entity may approve extensions when requested and justified by the non-Federal entity, as applicable.
2. Given that Project Closeout occurs after the end date of the sponsored project, and project personnel may not be available after said end date, specifically the PI/PD, the OGER Post Award Manager will provide support to the corresponding organizational unit in which the sponsored project was located and the Finance Office, in reviewing final programmatic and fiscal reports to ensure compliance with all the grant terms and conditions, as well as to make sure funds were spent appropriately.
3. The sponsored project will be considered officially closed when the awarding agency confirms that the recipient (Sagrado) has completed all the required grant work and all the applicable administrative tasks. Until the awarding agency confirms this, Sagrado is still responsible for fulfilling all the terms of the grant.
4. According to the Property Control Regulation, as amended, and §200.344 (f), Sagrado must account for any real and personal property acquired with Federal funds or received from the Federal Government in accordance with § 200.310 through 200.316 and 200.330; hence, a final inventory of all acquired property and equipment must be performed. OGER will retain a copy of the final inventory in its electronic project files.
5. According to §200.334 - Retention requirements for records, financial records, supporting documents, statistical records, and all other Sagrado records pertinent to a Federal award must be retained for a period of three (3) years from the date of

submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. All financial records will be kept by the Finance Office. All other records will be kept by the corresponding organizational unit in which the sponsored project was located. OGER will serve as a backup unit for these documents.

6. Although steps 1 – 5 of this section apply to federal grants, Sagrado will apply the same procedures to all sponsored projects held.
7. In cases where sponsored funding is obtained from an agency or dependency of the Government of Puerto Rico, including as a pass-through entity (i.e., a non-Federal entity that provides a subaward to a subrecipient to carry out part of a federal program, according to §200.1), records pertinent to the award must be retained for a period of six (6) years or an audit by the Office of the Comptroller of Puerto Rico, whichever comes first, according to Regulation No. 33 Registration of Contracts, Deeds and Related Documents and Copies to the Office of the Comptroller of the Commonwealth of Puerto Rico, pursuant to Act No. 18 of October 30, 1975, as amended (2 L.P.R.A. § 97-98).

## **IX. Post Award Capacity Building**

The objective of post award capacity building is to provide assistance and continuing education to corresponding Sagrado academic and administrative units on the sponsoring entities applicable rules and regulations and best practices for project implementation in order to assure compliance at all levels.

1. OGER staff will schedule meetings, seminars and workshops related to:
  - a. Applicable laws, rules, regulations, and procedures applicable to sponsored programs.
  - b. Provide constant assistance to all the Sagrado academic and administrative departments and staff related to the efficient administration of all sponsored projects.
  - c. Other topics relevant to post award issues as they arise or are requested.
2. OGER will develop an annual training schedule with a minimum of quarterly workshops addressing a variety of sponsored award post award topics.

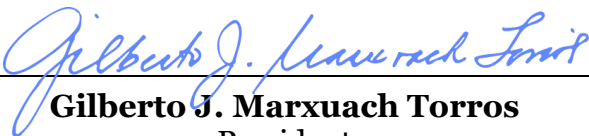
## **X. Questions About this Procedure**

Questions regarding the scope and interpretation of this Procedure should be directed to Grants and External Resources Director at 787.728.1515, ext. 5804, or by email to [oger@sagrado.edu](mailto:oger@sagrado.edu).

Universidad del Sagrado Corazón reserves the right to interpret this Procedure in its administration, implementation, and enforcement. If there is any ambiguity in any provision of this Procedure, Sagrado reserves the discretion to interpret it in accordance with the purpose for which it was established, the impact to Sagrado's operations and good faith, unless otherwise provided by law.

### **XI Reporting Violations**

Violations to this Procedure should be directed to the office of Compliance, Internal Audit and Institutional Integrity at [cumplimiento@sagrado.edu](mailto:cumplimiento@sagrado.edu). Any violations to this Procedure will be addressed in accordance with the Sagrado's policies and procedures.

  
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**Gilberto J. Marxuach Torros**  
President