

Sponsored Projects Property Control Manual

Executive Summary 2016 Changes

Overview

The Sponsored Projects Property Control Manual captures the CU Boulder campus' policies, processes and procedures for property acquired on sponsored awards. The manual includes instructions for the acquisition, use and maintenance, reporting, inventory, and disposal of property acquired on sponsored awards. Specific controls for the stewardship of Government property that are in compliance with the Federal Acquisition Regulation (FAR) are described. Users of this manual on the CU Boulder campus include departmental property managers and sponsored project administrators, Office of Contracts and Grants (OCG) pre- and post-award staff, and Property Accounting Office staff. As part of the CU Boulder Property Control System Analysis (PCSA), this manual is also reviewed by the cognizant agency's administrative contracting officer (ACO).

The previous version of the Property Control Manual, drafted in the fall of 2014, reflected the current business process. Further documentation of procedures and systematic review of processes, necessitated a substantive revision of the Sponsored Projects Property Control Manual in 2016. As part of the review and revision, the OCG Compliance team identified definitions and processes that could be clarified in order to provide better instruction to departmental property managers and sponsored projects administrators. Furthermore, the revision of the manual includes specific institutional standards that are more clearly articulated to the greater campus. The changes described below were made in order to address two priorities: (1) describe and document new procedures and (2) clarify current definitions, processes and procedures.

Major Changes

1. Reorganization of sections that describe ownership of title, acquisition methods, subcontractor oversight, and use and maintenance.

When originally drafted, the writers intended each section of the manual as a standalone description of a policy or process. These sections often did not capture complete details on an entire process, but rather directed users to see additional sections within the manual. To the extent possible in the revision, the flow of the manual was adjusted so that processes described in separate sections could be consolidated. Overviews were added to each major section to inform users about the content of each section.

2. Definitions added for capitalization rules, computers and electronic devices, general purpose equipment, non-capital equipment, permanent equipment, special purpose equipment and supplies.

These terms are commonly referred to by the entire CU Boulder campus, especially by OCG staff. Adding clear definitions for these terms to the manual creates consistency in the use of these terms across the campus.

3. The overview section was amended to the [Purchase, Use and Disposal of Sponsored Projects Property Procedural Statement](#), which is part of the CU Boulder campus's cost principles policy group.

With the regulatory changes issued under the Uniform Guidance, 2 CFR 200, the campus determined that a set of cost principles policies was needed in order to document compliance with the new regulations. Specifically, the campus did not previously have an up-to-date written policy that addressed the allowability, allocability and consistent treatment of property costs on

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sponsored projects. The above-reference procedural statement became effective on 7/1/2016 and it serves as the campus policy for the purchase, use and disposal of sponsored projects property. Departmental property managers and sponsored project administrators on the campus are directed to follow both the policy articulated in the procedural statement and the specific procedures outlined in the manual.

4. Sections describing the definitions, processes and procedures related to fabrications were updated with more detailed information on the vesting of title, accounting practices, allowable costs, and closeout obligations.

Fabrications can be very complicated and questions frequently arise at both the pre- and post-award stages on whether particular items meet the criteria to be accounted for as fabrications. The information added in this section addresses some of those common concerns. Coordination between OCG and Property Accounting Office staff has also improved, which has streamlined fabrication set-up and closeout processes.

5. The sections describing award closeout processes were significantly revised to more accurately describe how CU Boulder resolves property obligations for federal and non-federal awards. A new process for internal property reporting is also described.

Over the last year, the OCG Compliance team has implemented new award closeout practices leveraging electronic research administration systems. At an institutional level, the OCG Senior Compliance Closeout Officer has been working to improve on the efficiency with which administrative closeouts are completed, including assuring that property reporting obligations are met. Therefore, new closeout practices includes an internal property reporting process that facilitates communications between departmental property managers and sponsored project administrators, and OCG and Property Accounting Office staff, when property reports are required by sponsors.

Conclusion

Changes made in October 2016 to the Sponsored Projects Property Control Manual are part of the CU Boulder campus's commitment to ensure compliant stewardship of property acquired on sponsored awards and dedication to continual process improvements. The revisions made to the manual are consistent with university policies, agency requirements, state laws, and federal regulations. Furthermore, the revised manual meets the needs of a wide user-group by succinctly capturing campus standards for the protection, preservation, reporting, and control of property acquired on sponsored awards.