

UCSF
 UCSF UNIFORM GUIDANCE WORKGROUP ASSESSMENT REPORT – UPDATE ON UCSF ACTIONS AND OUTPUTS

The UCSF Uniform Guidance workgroup has been working alongside the UCOP system-wide system task force to evaluate policies and procedures in the guidelines and its appropriate implementation system-wide and at UCSF.

The UCSF workgroup has met regularly developing guidance, work aids, and establishing a Uniform Guidance web page at <https://osr.ucsf.edu/content/uniform-guidance-federal-awards>. The web page lists key concepts, the campus work group members, timeline, campus communications, references and agency specific guidelines.

Regular updates and briefings on Uniform Guidance occur during monthly Research Administration Town Hall meetings and on the UCSF Uniform Guidance web page.

Assessment Report Task	UCSF Action	Output
Definitions/Direct Charging		
Define “essential” with regard to computing devices, found in section 7-210 of the C&G Manual.	<ul style="list-style-type: none"> • Uniform Guidance Quick Reference Guide for PI’s • OSR Uniform Guidance website 	https://osr.ucsf.edu/sites/osr.ucsf.edu/files/UCSF%20Uniform%20Guidance%20Quick%20Guide%20032015.pdf http://osr.ucsf.edu/content/uniform-guidance-key-concepts
Define “integral” with regard to administrative and clerical salaries, found in section 7-310 of the C&G Manual.	<ul style="list-style-type: none"> • Uniform Guidance Quick Reference Guide for PI’s • OSR Uniform Guidance website 	Created Uniform Guidance – Quick Reference Guide for PIs
Revise section 7-210 of the C&G Manual to include language related to computing devices.	<ul style="list-style-type: none"> • Uniform Guidance Quick Reference Guide for PI’s • OSR Uniform Guidance website • Uniform Guidance Section in 2015 Controller’s Office Newsletters covering definitions and major changes to cost allowability and the UCSF interpretation and policy • Updates at the Bi-Monthly Research Administration Town Hall 	
Define “engagement” (§200.308) and explore the need for monitoring a PI’s engagement with the project.	<ul style="list-style-type: none"> • PI Absence from Project key concept help aid 	http://osr.ucsf.edu/content/uniform-guidance-key-concepts

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Internal Controls		
<p>Complete internal control assessment tool to determine whether there is reasonable assurance that internal controls are in place prior to FY16. This would include a comprehensive assessment of policies, procedures, training and systems.</p>	<ul style="list-style-type: none"> UC wide Controller's group is developing consistent system wide internal controls documentation. 	<p>Draft Internal Controls documentation templates distributed for review; last draft shared with C&G Accounting managers in April 2016</p>
<p>Are internal controls effective? Do they need to be strengthened?</p>	<ul style="list-style-type: none"> System wide document will be based on principles of accountability with respect to financial transactions. 	<p>Estimated issuance for use with FY2017 Audit.;</p>
<p>Take action to strengthen inadequate internal controls.</p>		
Certification of Vouchers/Invoices		
<p>Determine if current signature authority for extramural funds is sufficient to comply with the new Uniform Guidance requirement that official signing be authorized to "legally bind" the non-federal entity. If not, seek authorization for those individuals. The authorization must be in place by the effective date of the Uniform Guidance.</p>	<ul style="list-style-type: none"> Updated all certification language on templates for financial reports and invoices. 	<p>Estimated issuance January 2015</p>
<p>Seek advice from the Office of General Counsel to clarify the legal ramifications of signing such a statement. Additionally, procedures should be established for the defense of individuals by the university in cases where they are pursued legally by the federal agencies for certifying on behalf of the university.</p>	<ul style="list-style-type: none"> No changes to existing policy needed. Updated standard operating procedures to ensure correct signing officials were signing off. 	
Subrecipient Monitoring Subgroup		
<p>Review, and revise if necessary, BUS-43: Material Management, RPAC Memo 85-31: Sub agreements for Research, Training, and Public Service Under Extramural Prime Awards and University Program Award, and RPAC Memo 06-05: Expanded Guidelines on the Classification and Monitoring of Transactions with Third Parties under Federal Grants and Cooperative Agreements to ensure they are in compliance with Section §200.330 of Uniform Guidance.</p>	<ul style="list-style-type: none"> UCSF participated in the update of C&G Manual Chapter 16. 	<p>Completed October 2015</p>
	<ul style="list-style-type: none"> Review and comment on draft sub award section prepared by the UCOP Workgroup. 	<p>Provide comments to UCOP on draft sub award section; estimated issuance Spring 2016</p>

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Equipment Management Subgroup		
Revise BUS-29: Management and Control of University Equipment to explicitly include Use, FAIN and Percentage of Federal Participation in the minimum list of mandatory data fields under section III.B.7.	<ul style="list-style-type: none"> Current UCSF procedures already adhere to Uniform Guidance. 	UCOP is planning to update documents to adhere to Uniform Guidance; estimated issuance Spring 2016
Revise BUS-38: Disposition of Excess Property and Transfer of University-Owned Property as related to the disposition of property.		UCOP is planning to update document to adhere to Uniform Guidance; estimated issuance Summer 2016
F&A Subgroup		
Revise the C&G Manual to include participant support costs as a budgetary item that is not subject to F&A. Guidance will be needed to define what costs are appropriately in the participant support category and to clarify that those charges are not included in the modified total direct cost base.	<ul style="list-style-type: none"> Uniform Guidance Quick Reference Guide for PI's OSR Uniform Guidance website 	https://osr.ucsf.edu/sites/osr.ucsf.edu/files/UCSF%20Uniform%20Guidance%20Quick%20Guide%20032015.pdf Created separate GL account code to track costs and allow for the exclusion of Indirect Cost Recovery; this account code was also added to MyExpense so that reimbursements made for this category can be posted directly to the ledger appropriately.
Revise C&G Manual Chapter 8 Indirect Cost	<ul style="list-style-type: none"> UCOP leading Chapter 8 update 	Spring/Summer 2016
Effort Reporting Subgroup		
Review C&G Manual section 7-330 to remove restrictive language on effort reporting. Explore alternatives to effort reporting and payroll certification.	<ul style="list-style-type: none"> Workgroup, chaired by CGA, is reviewing alternatives. Revisions to C&G Manual sections 7-330 and 2-700. Project in FY2017 to explore other options that meet the revised internal control requirements in the Uniform Guidance. 	Draft distributed for Workgroup review December 2015; Estimated issuance February 2016

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Prior Approval/Engagement Subgroup		
Update the C&G Manual and guidance memos as necessary to conform to the prior approval changes in the Uniform Guidance.	<ul style="list-style-type: none"> • Topics posted on web site within posts. • Provided insight into those changes from previous prior approval requirements in the Uniform Guidance Quick Reference Guide for PIs. 	Updates to campus via CO Newsletters, Town Halls and the Uniform Guidance Website as agencies updated or waived their prior approval requirements
Compare overall travel section with UC travel policies and procedures.	<ul style="list-style-type: none"> • Issued guidance on travel policies of recommended updates to campus. 	Pending guidance from UCOP on family friendly policies
Agency-Specific Implementation Grid Subgroup		
Review federal agency implementation plans.	<ul style="list-style-type: none"> • A comparison matrix was developed showing specific agency implementation plans. 	https://osr.ucsf.edu/content/agency-specific-guidelines