



National Science Foundation
**Office of Budget, Finance, and
Award Management**

BUSINESS SYSTEMS REVIEW (BSR) GUIDE

Final Version 4.0

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SUMMARY OF SIGNIFICANT CHANGES

The *Business Systems Review (BSR) Guide* has been revised to reflect recent significant changes and improvements made to the BSR process although no revisions have been made to the substance of the review. Version 4.0 of the *BSR Guide* provides a more streamlined approach to the review procedures and emphasizes the importance of collaboration between the National Science Foundation (NSF) and the Awardee in order to improve the Awardee's business processes. The timing of the overall review process and delivery of the Draft BSR Report was accelerated to ensure that the Awardee and the Facility were provided written notification of high risk areas soon after they were identified.

One of the key changes to enable the BSR process was a more structured approach replacing a lengthy document review process and simultaneous report writing phase with a concentrated desk review process. Previously, experts responsible for each Core Functional Area (CFA) were involved in all aspects of the BSR process starting from the desk review through follow-up and monitoring, which extended over a six month period. This process has now been modified. The desk review process is now close-ended with a dedicated team of experts, known as the Content Specialists, focusing their attention solely on available Awardee policies, practices, procedures, and materials submitted to identify any gaps or concerns with compliance requirements. Then another group of experts, the Writing Analysts, use these assessments to provide input to the NSF Lead to refine the existing review strategy in order to complete the subsequent stages of the BSR. The Writing Analyst are responsible for pursuing any outstanding issues with the Awardee through teleconferences and, as necessary, site visit reviews and document their results in the BSR Draft Report. Areas of Concern are highlighted in an Implementation Plan which is sent to the Awardee and includes responsibilities, due dates, and deliverables required to address the high risk issues. The Plan is monitored by the BSR Lead. The Program staffs involved in the BSR process are expected to provide the same level of support as in the past and there were no procedural requirements or changes made to their level of oversight.

The *BSR Guide* will continue to be updated annually based on process improvements and changes to Federal regulation requirements. In the intervening period, the changes that are made will be documented in approved written desktop procedures. These updated procedures, along with a copy of the *BSR Guide*, will be shared with the NSF and Awardee stakeholders prior to commencing each BSR. The stakeholders will be notified that the revised desktop procedures provided are the most current and will be used in their review superseding the corresponding information in the published version of the *BSR Guide*.

Significant Changes – Business Systems Review Guide – Version 4.0

Revisions to Terminology were made to describe certain NSF stakeholders (*i.e.*, Content Specialist and Writing Analysts) in order to make more consistent the application of stakeholder terminology. These position descriptions were created to better describe the roles of the reviewers in the BSR process and, together with the BSR Lead, are referred throughout the Guide as the BSR Participants. In addition, the Guide references a BSR Core Team, comprised primarily of contractor staff, who assist with coordination and logistics and provide support to the BSR Participants in order to facilitate each stage of the process and complete the review and report within the new established timeframes.

Minor Editorial Changes have been made throughout the document to either clarify or enhance the intended meaning of a sentence or section. Part I has been streamlined to eliminate redundancies and repetitiveness in sections (*e.g.*, combining overview and detailed sections). Hyperlinks have been inserted in Part II to leverage web functionality.

Part I–Business Systems Review Process

- **Table 1** includes the role of the BSR Lead who manages a BSR effort. In most cases, the BSR Manager will serve in this capacity although there may be occasion where another LFO senior staff would be assigned this responsibility.
- **Figure 2 – Overview of the BSR Process** has been inserted reflecting the steps and time requirements for the revised process. This figure represents the consolidation of the previous *BSR Guide* Version 3.2 Figures 1 and 2.
- **Section 3.3 Desk Review** has been changed to reflect the revised BSR process. The desk review and site visit activities are now distinct. The desk review will be treated as a stand-alone task with its own steps, milestones, and deliverables and conducted by a team of experts, the Content Specialists, using a highly structured reporting format. The resulting analyses will be used by another group of experts, the Writing Analysts, to provide input to the NSF Lead to further refine the review strategy for each CFA.
- **Section 3.6 Follow-up and Monitoring** accelerates the timing for the deliverables of the Draft Report and Implementation Plan.
- **Section 3.6.1 Draft BSR Report Preparation** consolidates information from the review into a concise reporting format focusing specifically on results and observations and is issued to the Awardee within 10 business days of the last day of site visit.
- **Section 3.6.2 Implementation Plan Formulation**, accelerates the timing notification to the Awardee. Once the Draft Report results are issued, the Implementation Plan is developed to address the high risk issues. Follow-up/monitoring on high risk areas will be initiated within 15 business days following the last day of the site visit.
- **Section 3.6.4 BSR Final Report Preparation**, will no longer be tracked nor will it trigger follow-up/monitoring. Rather, the BSR Final Report will serve solely as a historical summary and final snapshot of the overall BSR activity.
- **Section 3.6.5 Administrative Closeout** defines the completion of the BSR process. Once conditions of the Implementation Plan are satisfied, the BSR is complete. Awardee will be notified that the BSR is considered administratively closed concluding LFO's oversight of the process.
- **Section 3.7 Post BSR Oversight** has been added to clarify the transition of oversight responsibilities for any remaining follow-up and monitoring activities from LFO to the Program Officer and the cognizant Grants and Agreements Official.

Part II–Core Functional Area Review Modules

- **Financial Reporting** includes an increased emphasis on program income reporting. In addition, plans are in place to revise sections of this module to incorporate the new Award Cash Management Service (ACMS) which replaces the current Federal Financial Report (FFR) and cash request functions. These changes will be made once NSF completes the transition to the new system. The ACMS is NSF's new award payment process under which Awardee institutions will provide award level detail at the time of the payment request.

Business Systems Review Guide – Version 3.2

The updated BSR Guides will continue to be published on an annual basis reflecting changes made to the process throughout the year. In the intervening period, the significant changes that are made will be documented in approved written desktop procedures. These updated procedures, along with a copy of the *BSR Guide*, will be shared with the stakeholders prior to

implementation of each BSR. The stakeholders will be notified that the revised desktop procedures are the most current and supersede the corresponding information in the published version of the *BSR Guide*.

Business Systems Review Guide – Version 3.1

Version 3.1 of the *BSR Guide* provides a more consistent approach to the review procedures and emphasizes the importance of collaboration between NSF and the Awardee in order to improve the Awardee's business processes.

Overall

- **The BSR Process** now includes a focus on American Recovery and Reinvestment Act (ARRA) funding to ensure appropriate oversight is in place to comply with the special requirements for these awards.
- **Revisions to Terminology** were made to some of the terms in the document to clarify the intent: “BSR Findings” has been replaced with “BSR Results,” “Areas Requiring Attention” has been replaced with “Areas of Concern,” and “Recommendations” has been replaced with “Areas for Improvement.”
- **Minor Editorial Changes** have been made throughout the document to either clarify or enhance the intended meaning of a sentence or section. Web link references have been updated and some others have been added to make it easier for the user to obtain additional information.

Part I–Business Systems Review Process

- **Section 2.1 Other NSF Stakeholders and Table 1** have been revised to reflect the roles of the NSF's Office of Budget, Finance, and Award Management (BFA) staff when providing assistance and support to non-NSF experts.
- **Section 3.2.3 Scoping Process, Introductory Visit** has been modified to clarify the actual steps in the process. The specific references and activities previously identified in the Scoping Session with the Awardee have been incorporated into the Introductory Visit section.
- **Section 3.4.1 BSR Report Preparation** includes a process to follow when there is a need to request a deviation from the established timeframe in the event of extenuating circumstances.
- **Sections 1.4.4 and 3.4 Post Site Visit Activities** were updated to indicate that the BSR Manager and the NSF Program Officer, at their discretion, may require the Awardee to implement some of the areas for improvement.

Part II–Core Functional Area Review Modules

- **References** in Table 2 have been revised and updated. The References section of each of the CFA modules has been streamlined to highlight the sections and chapters of the documents that are particularly relevant for the expert's review.
- **ARRA Requirements** have been integrated into the applicable modules to focus attention on the specific terms and conditions necessary to comply with the ARRA funding requirements.
- **Procedures for Desk Review and Site Review** have been removed from the modules and moved to the introductory section of the *BSR Guide* Part II to eliminate redundancies.

- **Practices 1.1 and 1.2** have been revised in all of the modules to consolidate select portions of the review focus areas and eliminate redundancies.
- **Federal Cash Transactions Report (FCTR)** references were removed from the Financial Management and the Financial Reporting modules to reflect the transition to the use of the Federal Financial Report (FFR).
- **Other Review Areas** section has been added to each module to provide the experts the flexibility to explore business system areas that may have been identified during the scoping process or identified by NSF staff for special consideration that were not examined as part of the existing principles and practices reviewed.

Appendices

- **Appendix A, Sample Templates**, was deleted because these were not integral to the BSR.
- **Appendix B, List of Acronyms**, was updated to include acronyms that were added to the Guide.
- **Appendix C, List of References**, was moved for formatting purposes.
- **Appendix D, Reviewer Questions**, was moved for formatting purposes.

PURPOSE OF THE BUSINESS SYSTEMS REVIEW AND GUIDE

Business System Reviews (BSRs) of National Science Foundation's (NSF) large Facility projects (Facilities) are an integral part of NSF's advanced monitoring program. The BSRs are designed to provide oversight of the suite of business systems (people, processes, and technologies) that supports the administrative management of a Facility. The Large Facilities Office (LFO) within the NSF's Office of Budget, Finance, and Award Management (BFA), has the lead role in coordinating the assessment of these business management practices. The primary purpose of these reviews is to provide compliance assistance to the Awardee. LFO assembles a team of BSR Participants, experts which include Content Specialists and Writing Analysts, to assess the Awardee's policies, procedures, and practices to determine whether the administrative business systems used in managing the Facility meet NSF award expectations and comply with Federal regulations. The *BSR Guide* is designed for use by both our customer community and NSF staff for guidance in leading these reviews.

The *BSR Guide* defines the overall framework, structure, and details used by NSF in the review process. Management principles and practices are specified for eight Core Functional Areas (CFAs) and are used by BSR Participants in performing these evaluations. Roles and responsibilities of the NSF stakeholders involved in the process are outlined in the *BSR Guide* as well as the expectations of the Awardee.

The *BSR Guide* is divided into three parts:

1. **Part I—Business Systems Review Process.** This part outlines the planning, execution, and follow-up activities of a BSR as well as defining the roles and responsibilities of the individuals involved in the process.
2. **Part II—Core Functional Area Review Modules.** This part, divided into eight CFA modules, includes guidance that is used by the Content Specialists and Writing Analysts to evaluate the administrative business systems supporting the Facility. The framework for each module includes specific principles and practices as well as a list of suggested questions to guide the BSR Participants in conducting their review. However, these modules are designed to be flexible to allow the BSR Participants an opportunity to explore any additional review areas that they deem necessary in order to complete their evaluation.
3. **Appendices.** The appendices include the List of References, the suggested List of Review Questions, and the List of Acronyms used throughout the *BSR Guide*.

The *BSR Guide* is used in conjunction with relevant Office of Management and Budget (OMB) circulars and NSF award policy and guidance documents. The referenced OMB materials are accessible at <http://www.whitehouse.gov/omb/circulars/index.html>. NSF related material, such as the *Proposal and Award Policies and Procedures Guide (PAPPG)* and the financial and administrative award terms and conditions of the award, are located on NSF's external website at <http://nsf.gov/bfa/dias/policy/index.jsp>. The *BSR Guide* is based on the principles and practices contained in the document, *Managing Externally Funded Research Programs: A Guide to Effective Management Practices* developed by the Council on Government Relations (COGR).

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PART I – BUSINESS SYSTEMS REVIEW PROCESS

1. INTRODUCTION

The projects that are subject to a BSR are those major operating Facilities and Facility construction projects (Facilities) listed in the Major Research Equipment and Facilities Construction (MREFC) and Facilities sections of the NSF's annual Budget Request to Congress.¹ Inherent risks are associated with funding these Facility awards because of the high dollar investment, scientific complexity, and long-term commitment of support. Due to the complex nature of these awards, NSF recognized that there was a need to provide additional business oversight to monitor the Awardee's stewardship of the appropriated funds and provide compliance assistance and developed this BSR process.

NSF has identified eight core business systems that support a large Facility:

- General Management
- Award Management
- Budget and Planning
- Financial Management
- Financial Reporting
- Human Resources
- Procurement
- Property and Equipment.

However, each Facility is distinct, presenting a variety of challenges and concerns. The BSR process is flexible and takes these differences into consideration. Each BSR is tailored to address the unique aspects of the business arrangements used to support the Facility although not all Facilities receive the same level of scrutiny. The scope and level of review for each core business system is based on consideration of a number of risk factors. NSF works with experts to refine the review strategy that will be used to examine the complexities of the administrative business systems employed.

1.1 BSR Benefits

The aim of the BSR is to help the Awardee implement and maintain compliant business systems supporting the Facility. Specifically, a BSR provides a verification that the administrative and financial policies and procedures are written, conform to OMB requirements and NSF award expectations, and are used to manage the business needs of the Facility. Concerns that are identified during the review are shared immediately with the Awardee so that actions can be initiated quickly to address the issues and implement recommendations to improve the processes.

The BSR perspective differs from that of a NSF program merit review or financial audit. The focus of the review is on the business infrastructure that supports the daily administrative management of the large Facility rather than on the scientific activity. From a financial perspective, BSRs are not intended to certify or provide any type of assurance concerning the Awardee's business systems to third parties and do not follow the Government Accountability Office (GAO) Yellow Book standards. BSRs are also not part of the NSF Audit Resolution process which is handled by the Cost Analysis and Audit Resolution (CAAR) Branch in the

¹ NSF Budget Requests to Congress can be found at (<http://www.nsf.gov/about/budget>).

Division of Institution and Award Support (DIAS). Rather, they are a due diligence effort designed to give NSF stakeholders reasonable assurance that the business systems in place are capable of administratively supporting large Facilities and have met all NSF award and OMB compliance requirements.

The BSR also serves as a forum for NSF and the Awardee to discuss administrative and compliance issues and exchange information and ideas. Exceptionally good Facility business practices are noted and shared with other NSF Facility managers to help them improve their respective systems. This collaboration is intended to strengthen the relationship between NSF and the Facility Awardees and support NSF's monitoring responsibilities.

1.2 BSR Focus: Administrative Business Systems Supporting the Large Facility

NSF makes awards to a variety of institutions—universities, consortia of institutions, and nonprofit organizations—to build, operate, and manage large Facilities. These NSF Awardees assume legal and financial responsibility for the stewardship of the Federal funds which are provided to support the Facility infrastructure and operating activities.

The BSR focus is on the specific administrative business systems that support the Facility awards. For the most part, these are the existing business infrastructures that are already in place at an institution. However, there are situations when systems are designed to support a unique business operation or to address the needs of multiple institutions that partner in the management of the Facility. In these cases, the BSR focuses on the integration of the specific system into the management of the Awardee's overall business structure.

1.3 Frequency of BSR

Whenever possible, the BSRs are conducted on a five-year cycle, placing the reviews in the first or second year of each project period. A number of risk factors are considered in determining how often a review should take place such as:

- Continuing business risks in constructing or operating a Facility.
- Significant changes in the funding levels, management, scope or mission of the large Facility.
- Transition in the large Facility's life-cycle stage (*i.e.*, from construction to operations and maintenance).

However, there are also occasions when a BSR might be considered less frequently. For example, if the managing operator of the Facility remained the same and there were no changes to the business processes, the time period between BSRs might be extended or the scope of review significantly limited.

1.4 Timing of the BSR²

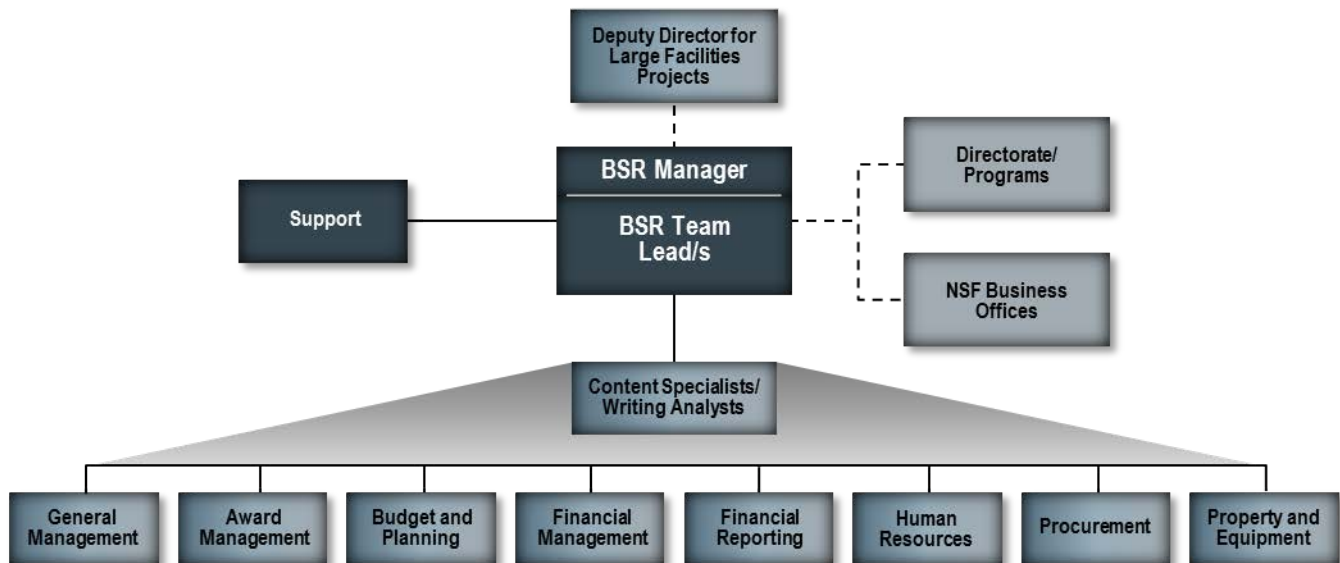
Generally, each BSR requires three-to-four months to complete and spans the period from Awardee notification through Administrative Closeout although timing may vary depending on the complexity of the review. Each phase in the review process is designed to build upon the preceding phase so that, at the end of the review, the Awardee will have a very strong impression of the Facility's business system compliance with OMB regulations and NSF award expectations.

² There may be extenuating circumstances that require an adjustment to the BSR draft report deadlines. In these situations, the BSR Lead will propose a revised timeline to the Deputy Director of Large Facility Projects with a justification for the need to deviate and will seek concurrence.

2. ROLES AND RESPONSIBILITIES

Each BSR has a number of internal and external stakeholders involved in the review process to ensure that the assessment is complete and areas of concern are addressed.

Figure 1 – NSF Stakeholders



2.1 NSF Stakeholders

2.1.1 Large Facilities Office

The Large Facilities Office (LFO), in BFA, has the lead responsibility for the NSF BSR process. The head of this office, the Deputy Director of Large Facility Projects (DDLFP), is the NSF official responsible to the NSF Chief Financial Officer (CFO) and NSF Director for the overall management of the reviews. The DDLFP is supported in this process by the BSR Manager. They work together to develop the annual BSR schedule. Each BSR is planned and organized by the BSR Manager who also serves, for most reviews, as the BSR Lead and the principal Point of Contact (POC) with the Awardee. The BSR Lead oversees all aspects of the review process. There are occasions where another LFO senior staff may be selected to lead a specific BSR effort.

LFO is also supported by a Core Team of NSF staff and contractor personnel who assist in all phases of the BSR process including pre-review coordination, site visit logistics, and report preparation.

2.1.2 BSR Reviewers—Content Specialists and Writing Analysts

The BSR Lead identifies a team of experts, the Content Specialists and Writing Analysts, who are assigned to complete an independent assessment of each Core Functional Area (CFA) of the BSR. These individuals are comprised of NSF staff, other government agency representatives, or contractor personnel.

The Content Specialists are selected based on their specialized knowledge of their core functional area focus as well as their understanding of applicable OMB circulars and NSF award requirements. They complete the desk review phase of the process by conducting an independent analysis of the policies, procedures, and practices provided by the Awardee to identify any potential compliance or risk issues. At the end of their review, the results of this assessment are documented and provided to NSF. After reviewing the results, the BSR Lead engages the Writing Analysts to complete their assigned CFA assessment and report their observations in the draft report. The Writing Analysts are experts with broad knowledge of Facility business systems and are skilled writers who are able to complete their reports within a compressed timeframe. They have the requisite knowledge and ability to assess the business systems during an on-site review, explain any compliance concerns to Awardee's senior management, and offer recommendations for improvements.

2.1.3 "Other" NSF Stakeholders

Various NSF staff members play important roles in the BSR process. The Program Officer provides key resource information on Facility operations and business systems. Other staff in the Scientific Directorates may contribute additional background information. The Grants and Agreements Official, or designated representative, provides background on award management issues and may also participate as one of the BSR Participants. Staffs from other BFA Divisions are also a valuable resource for information on the Awardee's business systems from an historical perspective and, on occasion, may also participate as one of the experts in the BSR. All of the NSF stakeholders are relied on to assist the BSR Participants in gathering information for the scoping process and may be called upon to provide their insights on the Draft BSR Report.

2.2 Awardee Stakeholders

It is critical that the Awardee's Team be composed of staff that are directly involved in the management of the business systems supporting the large Facility and can provide the time necessary to interact with the BSR Participants in all aspects of the review. Specifically, they are called upon at the pre-site visit teleconferences to answer questions raised by the Writing Analysts and to work with their NSF BSR counterparts on site to explain and demonstrate the various processes. The Awardee's Team is normally led either by the Authorized Organizational Representative (AOR), the Chief Financial Officer (CFO), or the Facility business manager who serve as the Awardee POC. They work with the BSR Lead to coordinate the scheduling process and provide the logistical support to the team if a site visit is necessary.

Table 1 summarizes the BSR stakeholders' roles and responsibilities.

Table 1 – BSR Stakeholders' Roles and Responsibilities

STAKEHOLDERS	ROLES AND RESPONSIBILITIES
NSF STAKEHOLDERS	
Deputy Director For Large Facilities Projects (DDLFP)	<ul style="list-style-type: none"> • Leads LFO Office • Approves BSR Scheduling • Authorizes <i>BSR Guide</i> Revisions • Monitors BSR Progress • Reviews Draft Report
BSR Manager	<ul style="list-style-type: none"> • Develops BSR Schedule • Trains NSF Staff in Process • Directs Support Operations • Oversees and Coordinates all BSR Activities
BSR Lead	<ul style="list-style-type: none"> • Coordinates BSR Review with BSR Manager • Serves as Primary Liaison with Awardee • Leads BSR Participants • Scopes the BSR • Develops and Refines the Review Strategy • Coordinates Draft Report and Final Report Activities • Develops and Monitors Implementation Plan
Content Specialist	<ul style="list-style-type: none"> • Comprehends OMB cost and administrative principles • Conducts Desk Review for one or more CFA Modules • Analyzes Documentation • Highlights Compliance Issues, Concerns, Gaps • Maintains and indexes supporting documentation • Provides input on Draft BSR Report and Implementation Plan, as necessary
Writing Analyst	<ul style="list-style-type: none"> • Comprehends OMB cost and administrative principles • Completes one or more CFA Modules • Makes Recommendations to refine Review Strategy based on Desk Review Evaluation • Authors CFA Sections of Draft Report and Implementation Plan • Explores Issues and Concerns with Awardee during Teleconference and/or on-site • Advises NSF Awardee of remedial action on Areas of Concern and Makes Recommendations for Improvements • Monitors Implementation Plan, as necessary
Scientific Directorates (Program Officer)	<ul style="list-style-type: none"> • Advises on Scheduling • Serves as Resource for the BFA Participants • Provides Programmatic Background Information • Reviews Draft Report and Implementation Plan • Monitors Resolution of Open BSR Issues
BFA Division Staff	<ul style="list-style-type: none"> • Serves as Resource to the BSR Participants • Provides Background Perspective

STAKEHOLDERS	ROLES AND RESPONSIBILITIES
Grants and Agreements Official	<ul style="list-style-type: none"> • Provides insight on administrative management of Facility • Notifies team of pending award actions • Identifies special award terms and conditions • Amends Cooperative Agreement, as necessary • Reviews Draft Report and Implementation Plan • Monitors Resolution of Open BSR Issues • Uploads BSR Report and Implementation Plan into award eJacket
Core Team	<ul style="list-style-type: none"> • Provide support to ensure an effective and efficient BSR process
AWARDEE STAKEHOLDERS	
Principal Investigator (Facility Director)	<ul style="list-style-type: none"> • Designates Awardee BSR POC • Provides Background Information on Facility Operations • Facilitates On-Site Review Activities • Assists in Resolving Implementation Plan Issues
Authorized Organizational Representative (AOR)	<ul style="list-style-type: none"> • Oversees Awardee compliance with the terms and conditions of the NSF awards • Monitors resolution of Implementation Plan Issues
Awardee BSR POC	<ul style="list-style-type: none"> • Coordinates Awardee BSR Support • Designates personnel to support each CFA • Arranges site visit logistics • Comments on Draft BSR Report • Coordinates Implementation Plan Activities
Core Functional Area Representative Counterparts	<ul style="list-style-type: none"> • Provides requested documentation • Participates in teleconference discussions • Supports BSR Participants on site • Resolves Implementation Plan Issues

3. BSR PROCESS

There are several stages in the BSR process. The schedule is developed for the upcoming fiscal year and once the Facilities have been selected, the BSR Lead begins the process to plan and scope each review.

Following is an overview of each stage in the process.

Figure 2 – Overview of the BSR Process



3.1 BSR Scheduling and Planning

Prior to the start of each fiscal year, the DDLFP and the BSR Manager meet to plan the master schedule for the upcoming BSRs considering the entire NSF portfolio of large Facilities. BSR selections are made based on a number of factors as shown below.

Factors in BSR Selections

- Continuing business risks in constructing or operating a Facility
- Period in the current award cycle supporting the Facility.
- Transition in the life-cycle stage of the Facility (e.g., construction and operations).
- Results of prior reviews, such as previous BSRs, or reviews conducted by NSF or other Federal agencies.
- Impact of recent audits completed by the Office of the Inspector General (OIG), other Federal agencies, or independent auditors (e.g., A-133 reports).
- Input from staff in the Scientific and Engineering Directorates as well as BFA.

Whenever possible, BSRs are planned for the first or second year of a Facility award with subsequent reviews scheduled at five year intervals although it may not always be possible to meet these goals. For example, scheduling may be deferred when a Facility award is being considered for recompetition because a BSR, if conducted, might burden the incumbent Awardee or compromise the independence of the review process. In order to stay current on factors that may have an impact on proposed BSR arrangements, the BSR Manager holds regular discussions with the DDLFP, BFA staff, and Awardees. In addition, the BSR Manager contacts the Program Officer to determine if there are any administrative issues identified in the program management reviews that should be considered in planning the BSR. The BSR

Manager also keeps in contact with the OIG and informs them of all pending BSR activities to ensure that there are no conflicts with any OIG on-going or scheduled work at the Awardee site. As a result, BSR scheduling must be an iterative process and continuously reevaluated as circumstances change. Timetables must be fluid and revised as new information becomes available. Once the master schedule is finalized, a BSR Lead is identified to direct each review. In most cases, the BSR Manager plays this leadership role although, on occasion, another LFO senior staff may be assigned as BFA Lead and charged with supervising the effort. The BSR Lead coordinates with the BSR Manager to begin the planning process for each BSR stage – Pre-Site, Site Visit, and Post-Site Visit activities.

3.2 Scoping Process

The first stage in the process is for the BSR Lead to define the scope of the review. This is an iterative process used to develop the review strategy which is the overall plan for conducting the BSR. Each Facility is unique with varying risk factors and each BSR is scoped to take these differences into consideration. The scoping process objectives are shown below.

Objectives of the Scoping Process

- Tailor the BSR to the specific Facility.
- Identify the highest risks using a systematic approach.
- Gain an understanding of the basic Awardee organizational structure as it relates to the management of the large Facility.
- Understand the physical nature of the large Facility, including any remote sites, in order to plan the appropriate coverage for the BSR and any potential site visit.
- Obtain insight into the business operations and systems supporting the large Facility as well as the integration of these systems within the Awardee's business infrastructure.
- Leverage and build on recent audits and other assessments of the Facility's business systems to enhance the BSR and avoid reviewing areas that may overlap.
- Establish a comprehensive targeted review and sampling strategy for each CFA based on risk factors.

3.2.1 Scoping Activities

The BSR Lead contacts NSF and Awardee staff and gathers information from a variety of sources in order to determine the scope for the review:³

Discussions with the Cognizant NSF Program Officer and the Grants and Agreements Official – The NSF Program Officer provides a high level summary of the Facility as well as any insights into the unique aspects and administrative challenges.

The Grants and Agreements Official shares his/her observations on the administrative management of the Facility and identifies any upcoming award actions that might affect the scope of the BSR.

Determination of Awardees and Awards – Most Facilities are managed by a single Awardee although some are administered by several Awardees under multiple awards. In these cases, the specific roles and Awardee's responsibilities pertaining to various aspects of construction and/or operations and maintenance (O&M) activities are detailed in each Awardee's cooperative agreements or subaward agreements. Owing to limited resources, the BSR may not be able to review all Awardee's business systems supporting the Facility. In these instances, the BSR Lead will consult with the NSF Program Officer and the Grants and

³ These activities are not necessarily performed in the order listed here.

Agreements Official for their guidance on conducting the review. Certain factors will be considered in making the determination – *e.g.*, risk issues, overall level of the Awardee’s fiduciary responsibility for construction or operation of the Facility, or oversight responsibilities for the management of multiple subcontract activities.

Coordination with the Cost Analysis and Audit Resolution Branch (CAAR) and the NSF OIG – The BSR Lead notifies CAAR and the NSF OIG of the planned BSR and requests any pertinent audit reports that are available. These reports will be evaluated by the BSR Lead to determine if the report findings overlap with any of the proposed CFAs principles or practices and, if so, will refine the review strategy accordingly based on this assessment. The BSR Lead will highlight the significant reporting findings for the Content Specialist and Writing Analyst to consider when they conduct their independent reviews.

Notification to the Awardee – The Awardee is notified by the BSR Lead of the pending BSR and discussions are held to explain the process and plan the upcoming review. The Awardee is asked to provide background information, internal guidance documents such as policies, practices, and procedures, and any other materials deemed relevant which will be evaluated during the desk review phase and used to refine the review strategy of the BSR.

Consideration of Potential Site Visit Locations – When a site visit is necessary, the onsite reviews are typically conducted at Awardee headquarters or the primary business offices of the Facility. However, some large Facilities have remote sites or business functions conducted in other locations (*e.g.*, a second observatory Facility). In these instances, the BSR Lead will consult with the Program Officer and Awardee to determine the value of exploring these sites in order to better understand the business systems and complete the assessment. For example, off-sites would be considered if there were specific business systems in place designed to accommodate the special needs of the remote site Facility. If these sites were to be reviewed, the visits would occur prior to or after the main site visit in conjunction with other NSF activities.

3.3 Desk Review

The purpose of the desk review is to assess the administrative business systems, policies, practices, and procedures in place that support the large Facility to determine if these are compliant with the OMB Circulars and NSF award expectations. A dedicated team of experts, known as the Content Specialists, are selected to conduct a focused desk review of supporting documentation that is made available by the Awardee electronically. The Content Specialists have specialized knowledge in their CFA focus areas and experience in applying the Federal compliance requirements to the policies and procedures under review.

3.3.1 BSR Kick-Off

To begin the review process, a kickoff meeting is held with the Program Officer, the Grant and Agreement Official, and all the BSR Participants (BSR Lead, Content Specialists, and Writing Analysts who will complete the BSR assessment) to discuss the BSR expectations. The BSR Lead will explain the BSR process, discuss the review strategy, and identify the steps and timeframes necessary to move forward. The Program Officer provides a brief overview of the scientific activities at the Facility and describes the management structure in place that support Facility administration. The Grants Official provides a briefing on the relevant awards. At the end of the session, CFA responsibilities are assigned, logistics clarified, and the dates confirmed to begin the desk review process.

3.3.2 Desk Review Process

Desk reviews normally take place over a week period. A conference room is available for the Content Specialist to meet so that they can focus their attention on completing their reviews. The Content Specialists independently analyze the materials collected from the various sources to understand the business systems applicable to their respective CFAs and to identify any potential risks, problems or gaps with compliance issues. This assessment is based on the quality of the documentation available at the time. The applicable OMB administrative and cost principle circulars as well as the NSF award terms and conditions are used as a baseline for this assessment. The Content Specialist is expected to record any issues, concerns, or omissions. A quality control check is performed by the BSR Lead at the end of each day to ensure that the process is moving forward.

3.3.3 Desk Review Debrief

When the desk review is complete, the Content Specialists debrief the BSR Lead, Program Officer, and Writing Analysts on the results of their independent assessment noting any issues, concerns, or gaps. These working files are annotated, organized, and stored on an internal repository and are subject to review by the NSF's annual financial auditors to ensure that the recommendations made in the BSR are supported. At this point, the desk review process is complete. These observations are used by the BSR Lead to refine the review strategies targeting high risk areas.

The documentation and assessment are given to the Writing Analysts who are responsible for completing the next stages in the process. Writing Analysts are also experts who have a broad understanding of Facility business systems and the requisite knowledge and oral and written skills to probe further into outstanding issues for their assigned CFA and make recommendations to address any concerns.

3.4 Site Visit Preparation

The BSR Lead determines, based on the results of the desk review and the resource available, if a site visit is necessary and, if so, identifies the Writing Analysts that should participate to complete the assessment of any business systems supporting the Facility that continue to have unresolved issues. The Writing Analysts will evaluate the desk review results summary to determine what principles and practices of the CFA have been addressed and which areas require further scrutiny and develop a strategy to assess the outstanding issues. For example, if there are gaps in documentation, the Writing Analyst will provide a list of missing documentation to the BSR Lead who will forward it to the Awardee. There may also be a need to test the Awardee's practices by sampling transactions to ensure that policies and procedures are followed. In these cases, the Writing Analyst will choose a selected period (*e.g.*, the last quarter of the fiscal year) and will request that the Awardee provide a listing of transactions (also known as a sampling universe). Sample transactions will be selected and the Awardee will be requested to provide source supporting documentation to support the expenditures.

The review strategy is continuously evaluated by the BSR Lead with input from the Writing Analysts and updated as additional materials become available. There may also be occasions where the review may be expanded to assess items that have been identified by NSF staff for special consideration.

3.4.1 Teleconference

Shortly before the site visit, teleconferences may be arranged between the Writing Analyst and their Awardee counterparts to clarify initial observations and issues identified during the desk review and to gain a better understanding of the applicable policies, procedures and processes for the CFA under review. For example, the Writing Analyst may ask the Awardee to walk through a process or procedure that may not be well explained or request forms or tools that support the process. If there were any areas of concerns identified during the desk review, the Writing Analysts would share these issues with the Awardee so that they could begin immediately to take action to address the issues.

3.4.2 Final Preparations and Logistics

The BSR Lead meets with the BSR Participants to finalize plans, address logistical issues, and discuss the main areas and concerns that will be addressed onsite. Final logistics are coordinated with the Awardee and the site visit agenda is set. The Awardee POC is contacted to verify that a conference room is available for the BSR Participants to meet privately throughout the week and that a separate room is accessible to conduct interviews and other BSR-related activities. Teleconference and Internet access also should be available, as well as print, copy, and scan capabilities.

3.5 Site Visit Activities

The site visit is targeted to gain a more detailed understanding of the business operations supporting the Facility, to clarify issues identified during the desk review and to test business processes to ensure that compliant internal controls are in place. Onsite activities include an entrance conference, interviews, and exit debriefing and may include a Facility tour and usually take place over a three to five day period.

3.5.1 Entrance Conference

An entrance conference is held on the first day of the site visit with the BSR Participants and the Awardee POC, Facility Director, and Awardee CFA representatives. The BSR Lead reiterates the purpose of the BSR and provides a brief overview of the planned activities. The Awardee BSR POC or Facility Director is invited to provide a high-level overview of the Facility activities and describe the administrative management structure.

3.5.2 Facility Tour

A Facility tour may be arranged for the BSR Participants if the BSR Lead and Awardee POC determine that the tour would provide insight into the business systems required to support the operations.

3.5.3 Individual Interviews and Group Discussions

The Writing Analysts interview their Awardee counterparts to gain insight into issues identified during the desk review process, to clarify the application of the policies and procedures on the existing business systems, and to gather additional information that may be necessary to support the conclusions in the BSR Draft Report. The schedule is set in advance and takes into consideration the time required to conduct the CFA review and sample analysis, the availability of the Awardee's CFA representatives, and the instances when the Writing Analyst may be representing multiple CFAs. Additional sample transactions may be requested to identify if

there were multiple occurrences of the questioned activity or whether the occurrence was an anomaly with mitigating factors.

3.5.4 Daily Assessments

Time is set aside at the end of each day for the BSR Participants to meet privately and discuss their results and observations. This time is also used to organize meeting notes, prepare for the next day's activities, consolidate supporting documentation, and draft the BSR report sections. Before leaving, the Awardee is invited to join the BSR Participants for a debrief on the status of the BSR and the needs for the next day.

3.5.5 Exit Conference

An exit conference is held on the final day to present the BSR Participants' preliminary observations and discuss plans for post-site visit activities. The BSR Lead presents a general overview of the BSR and provides the Awardee with a written, high level summary of the areas of concerns and significant issues that were found during the review. Each Writing Analyst also presents a brief oral summary of his/her preliminary CFA results. The Awardee staff has an opportunity to ask questions and clarify any concerns that are unclear. At the close, the BSR Lead explains the next steps in the process and provides the timeline for issuing the draft BSR Report and, if necessary, an Implementation Plan which will be used to track corrective actions to address any areas of concerns identified. The Awardee is encouraged to address any high risk areas immediately and to be prepared to respond in writing to these results when they are formally conveyed in the Implementation Plan.

3.6 Follow-up and Monitoring

Shortly after the site visit, the BSR Participants draft their BSR report identifying the areas of concern, recommendations for improvements, and best practices observed. These observations are shared with the Program Officer who, after reviewing the list, may want to require the Awardee to implement one of the areas identified for improvement. If so, the improvement would be added to the Implementation which is developed by the BSR Participants to provide the Awardee with an established framework and course of action to follow to resolve the outstanding issues. The draft report and Implementation Plan are provided to the Awardee shortly after completion of the site visit so that action to address any high risk areas identified can be initiated as soon as possible.

3.6.1 Draft BSR Report Preparation

Each Writing Analyst develops their CFA section of the Draft BSR Report based on their assessment of the reviewed materials, desk review results, teleconference discussions, and site visit observations. Significant issues or area of concern are highlighted to focus the Awardee's attention on these high risk areas that need immediate attention. The BSR Lead manages the process, reviews and comments on the draft submissions, and works with the Core Team to compile the Draft BSR Report. This report is sent to the Awardee for comment within 10 business days following the BSR Participants' return from the last site visit and is shared with the NSF stakeholders (*i.e.*, DDLFP, Program Officer, and the Grants and Agreement Official).

3.6.2 Implementation Plan Formulation

After the Draft BSR Report is distributed, the BSR Lead works together with the BSR Participants to develop an Implementation Plan to address areas of concern. This Plan is the blueprint for moving forward on high risk issues. The Plan includes assigned responsibilities,

due dates, and deliverables and is typically completed within one to two months of initiation. The Draft Implementation Plan is sent to the Awardee to ensure that the associated timelines and milestones for each resolution action are practicable. Reasonable accommodations are made to the schedule before the Final Implementation Plan is issued and implementation begins.

The Final Implementation Plan is sent to the Awardee within 15 business days following the site visit. This aggressive schedule is intended to ensure that any significant concerns or high risk issues identified during the review are conveyed to the Awardee as soon as possible and corrective action is initiated.

3.6.3 Implementation Plan Follow-Up and Monitoring

The BSR Lead monitors the Implementation Plan to ensure that all of the areas of concern identified are appropriately resolved. Some of the NSF Participants and other key NSF stakeholders may also be called upon to play key roles in the monitoring process. Based on the negotiated schedule in the Implementation Plan, the Awardee is required to provide periodic updates and supporting documentation reflecting progress made in resolving the outstanding issues. The reports are reviewed to ensure the Awardee has demonstrated a clear understanding of the areas of concern and that progress is consistent with the established timetable. The documentation is evaluated to ensure the material reflects the necessary changes to policies, practices, or procedures. This monitoring process continues until all of the outstanding issues have been addressed.

3.6.4 BSR Final Report Preparation

The BSR Final Report serves as a historic reference for the BSR and is normally completed and released to the Awardee approximately 30 business days following the issuance of the Draft BSR Report. The report summarizes the entire BSR procedure and contains the following key sections:

<i>Executive Summary</i>	Overview of the BSR and a summary of the results.
<i>Background</i>	Synopsis of the key scientific activities, business structure, and roles and responsibilities of Awardee stakeholders of the Facility.
<i>Scoping</i>	The process used and materials examined to develop the Review Strategy.
<i>Review Strategy</i>	The overview approach, activities and methods used to develop the extent of the review.
<i>Core Functional Area Reviews</i>	The specific observations and results for each CFA addressing Principles and Practices. Detailed results highlight the areas of concerns (critical requirements), recommended area for improvement, and best practices observed that exceed expectations of a proficient business system.
<i>Follow-Up and Monitoring Activities</i>	Follow-up to ensure that the areas of concern are resolved.
<i>Summary and Conclusions</i>	NSF's overall impressions of the administrative business systems supporting the large Facility and the results of the BSR.

3.6.5 Administrative Closeout

Administrative Closeout is the final step in the BSR process. All deliverables identified in the Implementation Plan are tracked and monitored by the BSR Lead until the high risk items have been addressed and resolved. At this point, the Grants and Agreement Official will insert the BSR Report and Implementation Plan into the Facility award eJacket. Once this stage is complete, the BSR Lead, supported by the Core Team, will cross check references in the BSR Final Report with the available electronic files to ensure that all of the files and documentation are available, indexed and retrievable for future review. Working files are subject to NSF's annual financial audit and will be checked to ensure that these files support the recommendations resulting from the BSR and that all of the procedures were followed. Once these steps are finished, the BSR Manager will notify all of the stakeholders that the BSR is completed and considered administratively closed.

3.7 Post BSR Oversight

There may be some issues identified that have long periods to implement (longer than the one to two months noted above). Once the BSR is administratively closed, responsibility for oversight of any remaining follow-up and monitoring activities are transitioned from the NSF LFO to the Division of Acquisition and Cooperative Support (DACS) in BFA. DACS is expected to work with the Program Officer to ensure that all of the outstanding issues are resolved.

PART II – CORE FUNCTIONAL AREA REVIEW MODULES

Part II is intended for use by the BSR Manager and Writing Analysts, but can be used as reference for all BSR Participants.

Each module contains the following sections:

- **Scope of Review** – Defines the topics and issues that are assessed for each particular CFA.
- **Supporting Documentation** – Identifies specific CFA supporting materials that are obtained from the Awardee and evaluated during the desk review phase of the process. If additional documents are required by the Writing Analyst in order to complete the scope of the review, these will be obtained by the BSR Manager prior to the site visit or provided by the Awardee on site.
- **Desk and Site Visit Procedures** – Lists common desk review and site visit procedures that are followed by the BSR Participants for each practice.

Desk Review (Content Specialists):

- Assess the various policies, procedures, and processes for the CFA for compliance with OMB regulations and NSF award terms and conditions.
- Complete the Core Functional Area Review Module based on the information contained in the provided materials.
- Note any observations, issues, or concerns for each question in the CFA Review Module.
- Organize and index supporting documentation used in the desk review.

Pre-Site and Site Visit (Writing Analyst):

- Formulate a strategy (e.g., personnel to interview, additional documentation to obtain) to investigate and address issues requiring follow-up.
- Review supporting materials and Content Specialist's analysis noting any gaps or concerns.
- Prepare a list of questions for discussion during the Awardee teleconference session in order to obtain clarification on any outstanding issues noted during the desk review.
- Participate in site visit review and compare practices to desk review observations. Note and discuss reasons for inconsistencies.
- Retain and organize supporting documentation collected during the site visit.
- Document observations in the BSR Draft Report and Implementation Plan.

For select CFAs, the Writing Analyst may need to sample some transactions and reports in order to assess whether outlined policies and procedures are being followed. If necessary, the Writing Analyst will choose a judgmental sample from a list of transactions provided by the Awardee and notify the BSR Manager of the selection. The BSR Manager will forward the list to the Awardee and ask them to have the source supporting material available for review by the BSR Participants during the site visit. The Writing Analyst is expected to document the sampling methodology used in his/her review, note the transactions tested, and include these observations in their final report.

- **Review Framework** — Includes focused principles and practices that are assessed for the specific CFA using guidance contained in the review focus areas and the desk and site visit procedures.

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To view the **review module** relevant to your area, click on the appropriate link:

- [General Management Review Module](#)
- [Award Management Review Module](#)
- [Budget and Planning Review Module](#)
- [Financial Management Review Module](#)
- [Financial Reporting Review Module](#)
- [Human Resources Review Module](#)
- [Procurement Review Module](#)
- [Property and Equipment Review Module](#)

To view the **references** relevant to your area, click on the appropriate link:

- [General Management Review References](#)
- [Award Management Review References](#)
- [Budget and Planning Management Review References](#)
- [Financial Management Review References](#)
- [Financial Reporting Review References](#)
- [Human Resources Review References](#)
- [Procurement Review References](#)
- [Property and Equipment Review References](#)

To view the **review questions** relevant to your area, click on the appropriate link:

- [General Management Review Questions](#)
- [Award Management Review Questions](#)
- [Budget and Planning Review Questions](#)
- [Financial Management Review Module](#)
- [Financial Reporting Review Questions](#)
- [Human Resources Review Questions](#)
- [Procurement Review Questions](#)
- [Property and Equipment Review Questions](#)

To view the **Acronym List**:

- [List of References](#)
-

1. GENERAL MANAGEMENT REVIEW MODULE

This module is used by the Writing Analyst to assess the administrative business systems supporting general management of the large Facility. It includes a list of references, supporting documentation, and framework to conduct the review. The framework contains several guiding principles for the core functional area as well as the practices that support each principle. Each practice contains review focus guidelines and a list of sample questions to aid the Writing Analyst in obtaining the information necessary to complete the review.

1.1 Scope of Review

The scope for this review is to assess the administrative business systems and organizational structure in place that support general management of the large Facility. The governance of the Facility is explored as well as processes related to strategic planning, performance measurements, internal audit, ethical standards, and regulatory compliance. The Writing Analyst also reviews the Facility's information technology (IT) systems, communication processes, record retention practices and safety issues with the Awardee. These are evaluated to determine if prescribed written policies and procedures are incorporated, internal controls are in place, and the systems are capable of supporting the administration of the Facility and are compliant with NSF expectations and award terms and conditions.

The Writing Analyst may refine the scope and review methodology presented in this module based on the unique aspects of the large Facility as well as the results of his/her scoping activities. Findings of previous internal and external reviews and audits should also be considered to avoid duplication of effort. All proposed changes to the scope or review methodology should be coordinated with and approved by the BSR Manager.

1.2 Supporting Documentation

Early in the process, the Awardee is requested to provide the supporting documentation listed below as well as any other materials that they deem pertinent to support this CFA review. Documents received are assembled in review binders, provided to the Content Specialist for the desk review, and posted to the BSR SharePoint site.

Core Functional Area Management:

- Names and titles of key personnel responsible for general management of the Facility
- Description of duties for the above key personnel
- Organizational charts specific to general management functions
- Information on continuing education opportunities for staff members responsible for general management.

Policies and Procedures:

- Policies and procedures related to—
 - Ethics program (e.g., standards of conduct, conflict of interest [COI])
 - IT security
 - Records retention
- Flowcharts of Facility business processes related to general management

- Any other documentation identified by the Awardee as pertinent to this core functional area.

Governance Documents:

- Published statement of the purpose of the large Facility
- Documentation on the powers that have been granted to the Awardee to enter into contractual relationships (e.g., articles of incorporation, by-laws)
- Delegated authority information
- Strategic planning process maps and other materials
- Copies of performance reports
- Description of the Facility's advisory structure
- Summaries of the advisory group's meetings for the last fiscal year.

1.2.1 Procedures

The common desk and site visit procedures for each module are listed in the introductory section of the *BSR Guide* Part II, above.

1.2.2 Framework Contents

PRINCIPLE 1. A MANAGEMENT STRUCTURE SHOULD BE IN PLACE TO CARRY OUT THE GENERAL MANAGEMENT RESPONSIBILITIES FOR THE FACILITY.

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the general management functions supporting the Facility.

Practice 1.2. Roles and duties of staff members responsible for general management of the Facility should be clearly assigned and defined.

Practice 1.3. The Awardee should have training and development processes and practices to address existing or anticipated skill or knowledge gaps.

PRINCIPLE 2. A STRATEGIC PLANNING SYSTEM SHOULD BE IN PLACE TO SET LONG-TERM GOALS, AS WELL AS SYSTEMS TO MEASURE, EVALUATE, AND IMPROVE OVERALL PERFORMANCE.

Practice 2.1. A system should be in place for long-term planning for the large Facility.

Practice 2.2. The Awardee should have documented procedures to measure the performance of various business systems that support the large Facility.

PRINCIPLE 3. THE AWARDEE SHOULD HAVE A FORMAL SYSTEM FOR AUDIT AND OVERSIGHT TO ENSURE COMPLIANCE WITH THE AWARD TERMS AND CONDITIONS.

Practice 3.1. The Awardee should have a program in place to ensure compliance with regulatory issues.

Practice 3.2. The Awardee should have written policies and procedures to address the conduct of the external independent audit and the internal audit responsibilities.

PRINCIPLE 4. POLICIES AND PROCEDURES SHOULD BE IN PLACE TO ADDRESS ETHICAL STANDARDS AND REGULATORY COMPLIANCE.

Practice 4.1. The Awardee should have a system in place to comply with ethical standards of conduct.

Practice 4.2. The Awardee should have conflict of interest (COI) policies and procedures.

PRINCIPLE 5. AUTONOMOUS COMMITTEES SHOULD BE IN PLACE TO PROVIDE ADVICE, GUIDANCE, AND OVERSIGHT FOR THE FACILITY.

Practice 5.1. Self-governing committees should be in place to provide guidance, direction, and oversight for the Facility.

PRINCIPLE 6. SYSTEMS SHOULD BE IN PLACE FOR THE MANAGEMENT OF RECORDS.

Practice 6.1. Record retention policies and procedures should be in place and follow the requirements of 2 CFR 215.53.

PRINCIPLE 7. THE AWARDEE SHOULD HAVE SYSTEMS IN PLACE TO ADDRESS OTHER GENERAL MANAGEMENT ISSUES.

Practice 7.1. Policies and procedures that support the large Facility should be in place to address cybersecurity and IT issues.

Practice 7.2. The Awardee should have a system to assure the security of buildings, equipment, information systems, and personal safety.

OTHER REVIEW AREAS

During the scoping process, the Writing Analyst may identify additional business system issues that should be explored which are not included in this module. In these cases, the Writing Analyst should notify the BSR Manager of their intent to expand the scope of the BSR. The Writing Analyst should follow the same approach as for other reviews focus areas to assess these additional issues. The Writing Analyst should document their observations and results in their core functional area reports.

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To view the *references* for this module, click [General Management Review References](#)

To view the *review questions* for this module, click [General Management Review Questions](#)

To view the *Acronym List*, click [List of Acronyms](#)

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2. AWARD MANAGEMENT REVIEW MODULE

This module is used by the by the Writing Analyst to assess the administrative business systems supporting award management for the large Facility. It includes a list of references, supporting documentation, and framework to conduct the review. The framework contains several guiding principles for the core functional area as well as the practices that support each principle. Each practice contains review focus guidelines and a list of sample questions to aid the Writing Analyst in obtaining the information necessary to complete the review.

2.1 Scope of Review

The scope of this review is to assess the administrative business systems and organizational structure in place to support award management for the large Facility. These are evaluated to determine if prescribed written policies and procedures are incorporated, internal controls are in place, and the systems are capable of supporting the administration of the Facility and are compliant with NSF expectations and award terms and conditions.

The Writing Analyst may refine the scope and review methodology presented in this module based on the unique aspects of the large Facility as well as the results of his/her scoping activities. Findings of previous internal and external reviews and audits should also be considered to avoid duplication of effort. All proposed changes to the scope or review methodology should be coordinated with and approved by the BSR Manager.

2.2 Supporting Documentation

Early in the process, the Awardee is requested to provide the supporting documentation listed below as well as any other materials that they deem pertinent to support this CFA review. Documents received are assembled in review binders, provided to the Content Specialist for the desk review, and posted to the BSR SharePoint site.

Core Functional Area Management:

- Names and titles of key personnel responsible for managing the NSF award
- Description of duties for the above key personnel
- Organizational charts specific to award management functions
- Information on continuing education opportunities for staff members responsible for award management.

Policies and Procedures:

- Policies, procedures, and guidance documents related to the award management functions, roles, and responsibilities for the Facility, including ARRA requirements as applicable
- Flowcharts of Facility business processes related to award management
- Any recent internal audits or reviews of award management issues
- Any other documentation identified by the Awardee as pertinent to this core functional area.

Reports and Supporting Materials:

- Quarterly and annual progress reports
- Other reports as required by the cooperative agreement

2.2.1 Procedures

The common desk and site visit procedures for each module are listed in the introductory section of the *BSR Guide* Part II, above.

2.2.2 Framework Contents

PRINCIPLE 1. A MANAGEMENT STRUCTURE SHOULD BE IN PLACE TO CARRY OUT THE AWARD MANAGEMENT RESPONSIBILITIES FOR THE FACILITY.

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the award management functions supporting the Facility.

Practice 1.2. Roles and duties of staff members responsible for award management of the Facility awards should be clearly assigned and defined.

Practice 1.3. The Awardee should ensure that award management staff members receive continuing educational opportunities to allow them to successfully manage Federal awards.

PRINCIPLE 2. THE AWARDEE SHOULD HAVE A SYSTEM IN PLACE TO ENSURE COMPLIANCE WITH THE TERMS AND CONDITIONS OF THE AWARD.

Practice 2.1. The Awardee should have established procedures to monitor compliance with the Federal regulations and the terms and conditions of the award.

Practice 2.2. The Awardee should have procedures to implement the Federal expanded authorities as provided in 2 CFR 215.25, including:

- Preaward costs less than 90 days
- Budget modifications (except Participant Support)
- Subawards (in accordance with the cooperative agreement)
- Rearrangements/alterations aggregating less than \$25K.

Practice 2.3. The Awardee should have a system in place to ensure adequate delivery of required reports and other deliverables.

PRINCIPLE 3. THE AWARDEE SHOULD HAVE POLICIES AND PROCEDURES FOR SUBAWARD MONITORING.

Practice 3.1. Systems should be in place for adequate post-award monitoring of subawards.

OTHER REVIEW AREAS

During the scoping process, the Writing Analyst may identify additional business system issues that need to be explored which are not included in this module. In these cases, the Writing Analyst would notify the BSR Manager of their intent to expand the scope of this BSR and follow the same approach used for the other review focus areas to assess these additional issues. The observations and results of the review should be documented in their core functional area reports.

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To view the *references* for this module, click [Award Management Review References](#)
To view the *review questions* for this module, click [Award Management Review Questions](#)
To view the *Acronym List*, click [List of Acronyms](#)

3. BUDGET AND PLANNING REVIEW MODULE

This module is used by the Writing Analyst to assess the administrative business systems that support the budget and planning process for the large Facility. It includes a list of references, supporting documentation, and framework for the review. The framework contains several guiding principles for the core functional area as well as practices that support each principle. Each practice contains review focus guidelines and a list of sample questions to aid the Writing Analyst in obtaining the information necessary to complete the review.

3.1 Scope of Review

The scope of this review is to assess the administrative business systems that support budget and planning for the large Facility. The review examines the management structure to determine whether the budget and planning functions align with the Facility objectives. The scope includes a comparative analysis of the Facility's budget and expenditures to determine whether budgets are adjusted to changing realities. These are evaluated to determine if prescribed written policies and procedures are incorporated, internal controls are in place, and the systems are capable of supporting the administration of the Facility and are compliant with NSF expectations and award terms and conditions.

The Writing Analyst may refine the scope and review methodology presented in this module based on the unique aspects of the large Facility as well as the results of his/her scoping activities. Findings of previous internal and external reviews and audits should also be considered to avoid duplication of effort. For example, if the Facility is under construction, NSF conduct external reviews, at least annually, looking into the budget formulation process, the basis for the estimate, risk management, schedule status and projections, and the change control process in greater detail than that which is proscribed in the BSR. In this situation, the Writing Analyst would take note and decrease the scope of the review. All proposed changes to the scope or review methodology should be coordinated with and approved by the BSR Manager.

3.2 Supporting Documentation

Early in the process, the Awardee is requested to provide the supporting documentation listed below as well as any other materials that they deem pertinent to support this CFA review. Documents received are assembled in review binders, provided to the Content Specialist for the desk review, and posted to the BSR SharePoint site.

Core Functional Area Management:

- Names and titles of key personnel involved in the budgeting process for the Facility
- Description of duties for the above key personnel
- Organizational charts specific to budget and planning functions
- Information on continuing education opportunities for staff members responsible for budget and planning.

Policies and Procedures:

- Processes and procedures for formulating, allocating, and tracking budgets, and developing cost estimates

- Most recent guidance from Facility senior management to program and budget directors to formulate base operating budgets, including templates.

Budgets:

- A timeline of budget exercises performed throughout the fiscal year (e.g., development, periodic review, closeout) and, if feasible, a list of line items used in budget development
- Facility budgets for construction and/or operations for the last fiscal year
- Flowcharts of Facility business process related to Facility budget and planning
- Documentation that supports the management and implementation of ARRA-funded awards at the Facility
- Any other documentation identified by the Awardee as pertinent to this core functional area.

Reports and Supporting Materials:

- Final Design Review Materials
- Project Execution Plan
- Annual Project Reports
- Strategic Planning Documentation.

3.2.1 Procedures

The common desk and site visit procedures for each module are listed in the introductory section of the *BSR Guide* Part II, above.

3.2.2 Framework Contents

PRINCIPLE 1. A MANAGEMENT STRUCTURE SHOULD BE IN PLACE TO CARRY OUT THE BUDGET PLANNING FUNCTIONS FOR THE FACILITY.

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the budget planning functions supporting the Facility.

Practice 1.2. Roles and duties of staff members responsible for budget planning for the Facility awards should be clearly assigned and defined.

Practice 1.3. The Awardee should ensure the staff members responsible for budget and planning receive continuing educational opportunities to allow them to successfully carry out their duties.

PRINCIPLE 2. THERE IS A SYSTEMATIC PROCESS FOR FORMULATING OPERATION BUDGETS FOR THE LARGE FACILITY.

Practice 2.1. The Awardee should have written processes and procedures, and use historical database information in developing operation budgets for the Facility.

Practice 2.2. The Awardee should establish a process for developing operational budget estimates that are reasonable and consistent with the scope and activity of the Facility.

Practice 2.3. The Facility program staff should be integrated into the budget planning process.

Practice 2.4. The large Facility budget should be aligned with the annual and long-term goals and objectives of the Facility.

PRINCIPLE 3. AN ESTABLISHED PROCESS ENSURES THAT BUDGETS ARE ADJUSTED IN RESPONSE TO CHANGES AFFECTING THE FACILITY.

Practice 3.1. The Awardee should have procedures for tracking and revising the budget.

Practice 3.2. The Awardee should establish procedures for year-end closeout.

Practice 3.3. The Awardee should have systems to adequately and accurately track budgets and expenditures for all the lifecycle stages of the Facility.

Practice 3.4. Regular budgeting and financial reports should be produced for Facility management, program, and budget personnel.

PRINCIPLE 4. PROCESSES ARE IN PLACE TO ADDRESS BUDGETARY UNCERTAINTY.

Practice 4.1. The Awardee should plan, to the extent possible, for unforeseen circumstances affecting Facility budgets.

PRINCIPLE 5. THE AWARDEE SHOULD HAVE A SYSTEM IN PLACE TO ENSURE COMPLIANCE WITH THE TERMS, CONDITIONS, AND SPECIFICATIONS OF THE AWARD RELEVANT TO BUDGET AND PLANNING.

Practice 5.1. The Awardee should have procedures in place to monitor compliance with the reporting requirements relevant to budget and planning.

OTHER REVIEW AREAS

During the scoping process, the Writing Analyst may identify additional business system issues that need to be explored which are not included in this module. In these cases, the Writing Analyst would notify the BSR Manager of their intent to expand the scope of this BSR and follow the same approach used for the other review focus areas to assess these additional issues. The observations and results of the review should be documented in their core functional area reports.

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To view the *references* for this module, click [Budget and Planning Management Review References](#)
To view the *review questions* for this module, [Budget and Planning Review Questions](#)
To view the *Acronym List*, click [List of Acronyms](#)

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4. FINANCIAL MANAGEMENT REVIEW MODULE

This module is used by the Writing Analyst to assess the administrative business systems that support financial management for the large Facility. It includes a list of references, supporting documentation, and framework for the review. The framework contains several guiding principles for the core functional area as well as the practices that support each principle. Each practice contains review focus guidelines and a list of sample questions to aid the Writing Analyst in obtaining the information necessary to complete the review.

4.1 Scope of Review

The scope of this review is to assess the administrative business systems and organizational structure in place that supports the financial management functions of the large Facility. These are evaluated to determine if prescribed written policies and procedures are incorporated, internal controls are in place, and the systems are capable of supporting the administration of the Facility and are compliant with NSF expectations and award terms and conditions.

Sampled transactions are reviewed to determine if costs claimed are adequately documented, allowable, reasonable, allocable, and consistently charged. The financial management systems are assessed to determine if the system can segregate direct and indirect costs, whether procedures are in place to accurately record time and effort, and whether the accounting systems enable the Awardee to provide appropriate business and financial oversight of the award.

The Writing Analyst may refine the scope and review methodology presented in this module based on the unique aspects of the large Facility as well as the results of his/her scoping activities. Findings of previous internal and external reviews and audits should also be considered to avoid duplication of effort. For example, if the accounting system supporting the Facility was previously approved by the cognizant Federal agency, such as Office of Naval research (ONR), Defense Contract Audit Agency (DCAA), or Department of Health and Human Services (DHHS), the Writing Analyst would take note and decrease the scope of this review.

All proposed changes to the scope or review methodology should be coordinated with and approved by the BSR Manager.

4.2 Supporting Documentation

Early in the process, the Awardee is requested to provide the supporting documentation listed below as well as any other materials that they deem pertinent to support this CFA review. Documents received are assembled in review binders, provided to the Content Specialist for the desk review, and posted to the BSR SharePoint site.

Core Functional Area Management:

- Names and titles of key personnel responsible for financial management of the Facility, including the delegated authority levels
- Description of duties for the above key personnel
- Organizational charts specific to financial management functions
- Information on continuing education opportunities for staff members responsible for financial management.

Policies and Procedures:

- Policies and procedures, standard templates and forms, and other documents related to financial management of the Facility
- Copies of the written policies and procedures for manual and/or computerized processing of transactions from origination, authorization, approval, ordering, receipt and payment; ultimately ending in charges to the sponsored project
- Chart of accounts and the accounting code(s) identified with the NSF award (also requested in the Financial Reporting Module)
- Explanation of cost classifications where more than one account code is used to track or monitor expenses in the chart of accounts
- Time and effort reporting policies and procedures, including documentation of employee base salary, the threshold for making changes from budgeted to actual effort in the after-the-fact verification, suitable means of verification (where reports are not signed by the employee or his/her supervisor), and a definition of the types of activities that should not be charged to federal awards (*e.g.*, Bid and Proposal costs)
- Information about any recently implemented or proposed significant changes in the accounting or financial systems or Awardee financial management policies and procedures
- Awardee's response to a recent A-133 audit and other corrective action plans or status update if material findings have been identified (*e.g.*, internal control, compliance questioned costs) in the A-133 audit report (also requested in the Financial Reporting Module)
- Copies of any recent internal audits or reviews of the Awardee accounting and/or financial management systems, including effort reporting (also requested in the Financial Reporting Module)
- Copies of any recent cognizant audit or oversight agency reports or review and analysis related to accounting systems and financial management (also requested in the Financial Reporting Module)
- Flowcharts of Facility business process related to financial management of the award
- Documentation that supports the management and implementation of ARRA-funded awards at the Facility
- Any other documentation identified by the Awardee as pertinent to this core functional area.

Financial Reports:

- Examples of accounting system reports, spreadsheets, and other documents or subsystems used by the Awardee personnel to manage and track expenditures and labor distribution for the Facility (*e.g.*, monthly expense reports provided to the Principal Investigator [PI] and/or Departmental Research Administrators)
- Comparison of actual to budgeted costs by expense category for the current award period, including approved budget, cumulative amounts expended to date, and any outstanding obligations incurred for but not yet charged to the NSF award. Request separate documents for ARRA-funded awards, if applicable.
- Summary of costs claimed, by expense category charged to the NSF award
- A listing of accounting transactions from the general ledger related to the NSF award for the most recently completed quarterly Federal Financial Report (FFR).
- List of salary charges to the NSF award from the project cost summary for the last fiscal year by amount and by employee name, position, and level of effort (*e.g.*, percentage, hours).

Facilities & Administrative (F&A) or Indirect Cost (IDC) Items:

- The Awardee's Cost Accounting Standard Board's (CASB) disclosure statement or cost policy statement
- Copy of the current negotiated indirect cost rate agreement.

Accounting Transactions:

- A listing of accounting transactions from the project cost ledger(s) related to the NSF award for the most recently completed FFR quarterly reporting period, including expense category, amount claimed, payee, date, description, and reference documentation where appropriate, (e.g., purchase order number) (also requested in the Financial Reporting Module). If the recipient is managing an ARRA-funded award, include it in the sampling request.

4.2.1 Procedures

The common desk and site visit procedures for each module are listed in the introductory section of the *BSR Guide* Part II, above.

4.2.2 Framework Contents

PRINCIPLE 1. A STRUCTURE SHOULD BE IN PLACE TO CARRY OUT THE FUNCTIONS OF FINANCIAL MANAGEMENT.

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the financial management functions supporting the Facility.

Practice 1.2. Roles and duties of staff members responsible for financial management of the Facility awards should be clearly assigned and defined.

Practice 1.3. The Awardee should ensure that financial management staff members receive continuing educational opportunities to allow them to successfully manage Federal awards.

Practice 1.4. The Awardee should ensure an appropriate segregation of duties for staff members performing the financial management functions for the large Facility.

PRINCIPLE 2. THE AWARDEE SHOULD HAVE AN ADEQUATE ACCOUNTING SYSTEM THAT IS COMPLIANT WITH THE APPLICABLE GENERALLY ACCEPTED COST PRINCIPLES (2 CFR 220, 2 CFR 230, FAR PART 31), ADMINISTRATIVE REQUIREMENTS (2 CFR 215), AND INTERNAL POLICIES AND PROCEDURES.

Practice 2.1. The Awardee should have systems in place to ensure compliance with mandated Federal and award-specific requirements, for cost principles, audit and administrative requirements, and other financial compliance regulations.

Practice 2.2. The Awardee should have a system in place to ensure that costs charged to the NSF award benefit and are properly charged to the sponsored project account. Costs should be consistently treated as direct or indirect costs. Allocated costs (e.g., fringe benefits, F&A, or IDC) should be equitably distributed. Internally allocated costs, such as recharge centers, should be periodically reviewed and approved by the Awardee.

Practice 2.3. The Awardee should have written policies and procedures defining allowability of costs that are consistent with Federal cost principles and the NSF award.

Practice 2.4. The Awardee should have policies and systems that differentiate costs as direct and indirect based on applicable Federal regulation and the terms of the negotiated IDC rate agreement.

Practice 2.5. The Awardee should have a system in place for accurate and consistent recording and reporting of direct time and effort costs charged to the NSF award.

PRINCIPLE 3. SYSTEMS SHOULD BE IN PLACE TO ENSURE THAT PROPER SOURCE SUPPORTING DOCUMENTATION IS MAINTAINED FOR COSTS INCURRED UNDER THE NSF AWARD.

Practice 3.1. Charges booked to the project cost ledger for the NSF award should be supported by adequate source documentation.

PRINCIPLE 4. THE AWARDEE SHOULD HAVE A SYSTEM IN PLACE TO ENSURE COMPLIANCE WITH THE TERMS, CONDITIONS, AND SPECIFICATIONS OF THE AWARD RELEVANT TO FINANCIAL MANAGEMENT.

Practice 4.1. The Awardee should have procedures to monitor compliance with the award terms, conditions, and specifications relevant to financial management.

OTHER REVIEW AREAS

During the scoping process, the Writing Analyst may identify additional business system issues that need to be explored which are not included in this module. In these cases, the Writing Analyst would notify the BSR Manager of their intent to expand the scope of this BSR and follow the same approach used for the other review focus areas to assess these additional issues. The observations and results of the review should be documented in their core functional area reports.

Below are examples of additional areas that could be considered for BSR review:

- *Construction and Operations of NSF Funded Research Platforms (applicable for MREFC funded projects).* Some NSF Facilities may be funded with different appropriated accounts which must be segregated. Typically, construction costs are funded with MREFC appropriations whereas operational funding is through Research and Related Activities (R&RA) accounts. Facility records would be reviewed to ensure that separate accounts are established for construction (MREFC) and operations (R&RA) costs and funding is not comingled.
- *Post-Retirement Benefits (applicable for NSF FFRDCs).* Financial Accounting Standards Board (FASB) Statement 106 requires that Awardees who provide post-retirement healthcare benefits must accrue for this liability for both current employees and retirees. In this situation, post-retirement benefit costs would be reviewed to determine how these costs are accrued and noted on the Awardee's financial statements.
- *Accrued Vacation Liability (applicable for NSF FFRDC).* Determine whether there is any liability to NSF for accrued vacation costs. Does the Awardee accumulate vacation costs as earned setting the funding into a separate account or expense vacation time when used by the employee?

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To view the *references* for this module, click [Financial Management Review References](#)
To view the *review questions* for this module, click [Financial Management Review Questions](#)
To view the *Acronym List*, click [List of Acronyms](#)

5. FINANCIAL REPORTING REVIEW MODULE

This module is used by the Writing Analyst to assess the administrative business systems that support financial reporting for the large Facility. It includes a list of references, supporting documentation, and framework to conduct the review. The framework contains several guiding principles for the core functional area as well as the practices that support each principle. Each practice contains review focus guidelines and a list of sample questions to aid the Writing Analyst in obtaining the information necessary to complete the review.

5.1 Scope of Review

The scope of this review is to assess the administrative business systems and organizational structure in place that supports the financial reporting functions for the large Facility. These are evaluated to determine if prescribed written policies and procedures are incorporated, internal controls are in place, and the systems are capable of supporting the administration of the Facility and are compliant with NSF expectations and award terms and conditions. The review also includes an analysis of cash management policies and procedures and the process for preparing and submitting of financial reports.

The Writing Analyst may refine the scope and review methodology presented in this module based on the unique aspects of the large Facility as well as the results of his/her scoping activities. Findings of previous internal and external reviews and audits should also be considered to avoid duplication of effort. For example, if the accounting system supporting the Facility was previously approved by the Cognizant Federal agency, such as ONR, DCAA, or DHHS, the expert would take note and decrease the scope of this review. Changes to any part of the scope or review methodology should be discussed with and approved by the BSR Manager.

5.2 Supporting Documentation

Early in the process, the Awardee is requested to provide the supporting documentation listed below as well as any other materials that they deem pertinent to support this CFA review. Documents received are assembled in review binders, provided to the Content Specialist for the desk review, and posted to the BSR SharePoint site.

Core Functional Area Management:

- Names and titles of key personnel responsible for financial reporting
- Description of duties for the above key personnel
- Organizational charts specific to financial reporting functions
- Information on continuing education opportunities for staff members responsible for financial reporting

Policies and Procedures:

- Organization-wide flowchart summarizing the manual and computerized processing of transactions from origination through payment, ultimately ending in charges to the different government projects
- Information on any recently implemented changes to the financial reporting systems or processes

- Documents that the organization uses for managing the financial reporting and payment functions, including a description of the internal control policies and procedures
- Chart of accounts used by the Facility (also requested in the Financial Management Module)
- Any recent internal audits or reviews of the Awardee accounting and/or financial reporting systems (also requested in the Financial Management Module)
- Copies of any recent cognizant audit or oversight agency reports or review and analysis related to accounting systems and financial management (also requested in the Financial Management Module)
- Documentation that supports the management and implementation of ARRA-funded awards at the Facility
- Any other documentation identified by the Awardee as pertinent to this core functional area

Accounting Transactions:

- Summary of costs claimed by expense category for the most recently completed fiscal year
- A separate project cost summary, with back-up documentation, corresponding to the reporting quarter for the ARRA-funded awards under review.
- List of accounting transactions from the general ledger related to the NSF award for the most recently completed quarterly reporting period (also requested in the Financial Management Module).

5.2.1 Procedures

The common desk and site visit procedures for each module are listed in the introductory section of the *BSR Guide* Part II, above.

5.2.2 Framework Contents

PRINCIPLE 1. A MANAGEMENT STRUCTURE SHOULD BE IN PLACE TO CARRY OUT THE FINANCIAL REPORTING FUNCTIONS FOR THE FACILITY.

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the financial reporting functions supporting the Facility.

Practice 1.2. Roles and duties of staff members responsible for financial reporting preparation and cash management for the Facility awards should be clearly assigned and defined.

Practice 1.3. The Awardee should ensure that financial reporting staff members receive continuing educational opportunities to allow them to successfully manage Federal awards.

PRINCIPLE 2. THE AWARDEE SHOULD HAVE ADEQUATE CONTROLS FOR PREPARING ACCURATE AND TIMELY CASH REQUESTS AND FEDERAL FINANCIAL REPORTS (FFR).^{4,5}

Practice 2.1. The Awardee should have documented policies and procedures related to the cash request and FFR preparation processes.

PRINCIPLE 3. THE AWARDEE SHOULD HAVE AN ACCURATE CASH MANAGEMENT PROCESS.

Practice 3.1. The organization should have a system in place to ensure proper advance payment or reimbursement requests from the sponsor.

PRINCIPLE 4. THE ORGANIZATION SHOULD HAVE A SYSTEM IN PLACE FOR ACCURATE AND COMPLETE FINANCIAL REPORTING THROUGH THE FFR.

Practice 4.1. The organization should have a system in place that identifies the link between the FFR amounts and the general ledger.

Practice 4.2. Program Income earned should be reported on the FFR each quarter.

PRINCIPLE 5. THE AWARDEE SHOULD HAVE ADEQUATE CONTROLS IN PLACE FOR ACCESS TO THE FINANCIAL FUNCTIONS.

Practice 5.1. Responsibilities for access and permissions to the Financial Functions for FFR preparation and cash requests are controlled and segregated.

PRINCIPLE 6. THE AWARDEE SHOULD HAVE A SYSTEM IN PLACE TO ENSURE COMPLIANCE WITH THE TERMS, CONDITIONS, AND SPECIFICATIONS OF THE AWARD FOR FINANCIAL REPORTING.

Practice 6.1. The Awardee has procedures in place to monitor compliance with the award terms, conditions, and specifications relevant to financial reporting.

OTHER REVIEW AREAS

During the scoping process, the Writing Analyst may identify additional business system issues that need to be explored which are not included in this module. In these cases, the Writing Analyst would notify the BSR Manager of their intent to expand the scope of this BSR and follow the same approach used for the other review focus areas to assess these additional issues. The observations and results of the review should be documented in their core functional area reports.

⁴ The Federal Financial Report (FFR) replaced the FCTR effective January 1, 2009. The FFR consolidates the SF-269 (Financial Status Report) and SF 272 (Federal Cash Transaction Report) into a single report. As such, references to FCTR have been omitted from the remainder of this section and replaced with FFR.

⁵ Effective April 2013, the Award Cash Management Service (ACMS), accessible through Research.gov, will replace the current FFR quarterly financial reporting process as well as the NSF cash request procedures. The ACMS is a new financial service which will transition financial processing of award payments from the current “pooling” method to a “grant-by-grant” method. This will require the submission of award level payment amounts each time funds are requested and eliminate the need for Awardee institutions to submit quarterly FFRs. Revisions to this CFA will be made in the near future to accommodate this change.

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To view the *references* for this module, click [Financial Reporting Review References](#)
To view the *review questions* for this module, click [Financial Reporting Review Questions](#)
To view the *Acronym List*, click [List of Acronyms](#)

6. HUMAN RESOURCES REVIEW MODULE

This module is used by the Writing Analyst to assess the administrative business systems that support human resources functions for the large Facility. It includes a list of references, supporting documentation, and framework for the review. The framework contains several guiding principles for the CFA, as well as practices that support each principle. Each practice contains review focus guidelines and a list of sample questions to aid the Writing Analyst in obtaining the information necessary to complete the review.

6.1 Scope of Review

The scope of this review is to assess the administrative business systems and the organizational structure in place to support human resources functions for the Facility. These are evaluated to determine if prescribed written policies and procedures are incorporated, internal controls are in place, and the systems are capable of supporting the administration of the Facility and are compliant with NSF expectations and award terms and conditions.

The Writing Analyst may refine the scope and review methodology presented in this module based on the unique aspects of the large Facility as well as the results of his/her scoping activities. Findings of previous internal and external reviews and audits should also be considered to avoid duplication of effort. All proposed changes to the scope or review methodology should be coordinated with and approved by the BSR Manager.

6.2 Supporting Documentation

Early in the process, the Awardee is requested to provide the supporting documentation listed below as well as any other materials that they deem pertinent to support this CFA review. Documents received are assembled in review binders, provided to the Content Specialist for the desk review, and posted to the BSR SharePoint site.

Core Functional Area Management:

- Names and titles of key personnel responsible for providing human resource support for the Facility
- Description of duties for the above key personnel
- Organizational charts specific to human resource functions
- Information on continuing education opportunities for staff members responsible for human resources.

Policies and Procedures:

- HR policies and procedures, handbooks, manuals, or employee communications related to the following:
 - Nondiscrimination regulations and policies
 - Drug-free workplace policies and practices
 - Strategic human capital or workforce planning (e.g., strategic human capital or workforce plans)
 - Operational human capital or workforce planning (e.g., recruiting, hiring or staffing plans, staff development plans)

- Applicant recruitment, screening, and selection (*e.g.*, position requisitions, advertisements/vacancy announcements, interview and selection guides, applicant applications)
 - Recognition and reward systems
 - Vacation and sick leave benefits
 - Employee development (*e.g.*, course listings, training records)
 - Whistleblowing protection policy
- Compensation and employee benefit descriptions and analyses
 - Any other documentation identified by the Awardee as pertinent to this core functional area.

HR Reports:

- Copies of any required government filings for the previous 3 years which may include:
 - Employer Information Report EEO-1
 - Form 5500 Annual Return/Report of Employee Benefit Plan
 - Summary Plan Descriptions
- Listing of any Equal Employment Opportunity Commission (EEOC) complaints filed within the last 3 years, including subsequent notification to NSF’s Office of Diversity and Inclusion (ODI)
- Listing of any employee convictions for violations related to the Awardee’s drug-free workplace policy, including subsequent notifications to the NSF Grants and Agreements Officer
- Documentation describing recent trends in employee vacancies, hiring, and attrition.

6.2.1 Procedures

The common desk and site visit procedures for each module are listed in the introductory section of the *BSR Guide* Part II, above.

6.2.2 Framework Contents

PRINCIPLE 1. A MANAGEMENT STRUCTURE SHOULD BE IN PLACE TO CARRY OUT THE HR FUNCTIONS FOR THE FACILITY.

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the human resource functions supporting the Facility.

Practice 1.2. Roles and duties of staff members responsible for human resources for the Facility should be clearly assigned and defined.

Practice 1.3. The Awardee should ensure that HR staff members receive continuing educational opportunities to allow them to successfully support the large Facility.

PRINCIPLE 2. THE AWARDEE SHOULD HAVE MECHANISMS IN PLACE TO ENSURE THAT NO PERSON IS DISCRIMINATED AGAINST BASED ON RACE, COLOR, NATIONAL ORIGIN, SEX, OR DISABILITY.

Practice 2.1. The Awardee should have mechanisms in place to ensure applicants and employees are aware of the organization’s nondiscrimination policies and practices.

Practice 2.2. The Awardee should have mechanisms in place to train selection officials and managers in their responsibilities in complying with nondiscrimination policies and practices.

Practice 2.3. The Awardee should have mechanisms in place to comply with specific nondiscrimination practices as described in relevant Federal regulations (*e.g.*, making reasonable accommodations for people with disabilities and instituting policies and practices to resolve discrimination complaints).

Practice 2.4. The Awardee should have mechanisms in place to assess its compliance with nondiscrimination policies.

PRINCIPLE 3. THE AWARDEE SHOULD HAVE MECHANISMS IN PLACE TO MAINTAIN A DRUG-FREE WORKPLACE.

Practice 3.1. The Awardee should have in place, and provide each employee engaged in the performance of the award, a published statement notifying employees of the requirements of the organization's policies and processes regarding a drug-free workplace.

Practice 3.2. The Awardee should have processes and practices in place to respond to violations of the drug-free workplace policy.

Practice 3.3. The Awardee should establish an ongoing drug-free awareness program.

PRINCIPLE 4. THE AWARDEE SHOULD HAVE A HUMAN CAPITAL OR WORKFORCE PLAN IN PLACE TO ENSURE ITS HUMAN RESOURCES ARE ALIGNED TO CARRY OUT ITS MISSION.

Practice 4.1. The Awardee should have mechanisms in place to identify the type and amount of work as well as the type of workforce required (*e.g.*, numbers and types of positions, workforce competencies, worker experience, educational/professional certifications) to meet the needs to support the large Facility.

Practice 4.2. The Awardee should have a process in place to identify gaps or surpluses in the workforce that may impede the Facility in accomplishing its mission and take the necessary steps to address the issues.

PRINCIPLE 5. THE AWARDEE HAS POLICIES AND PRACTICES IN PLACE TO PROVIDE SAFEGUARDS TO ENSURE THAT THE INSTITUTION COMPLIES WITH LAWS AND REGULATIONS REGARDING RECRUITMENT, HIRING, AND EMPLOYMENT.

Practice 5.1. The Awardee should provide mechanisms for employees to confidentially express concerns without fear of reprisal.

OTHER REVIEW AREAS

During the scoping process, the Writing Analyst may identify additional business system issues that need to be explored which are not included in this module. In these cases, the Writing Analyst would notify the BSR Manager of their intent to expand the scope of this BSR and follow the same approach used for the other review focus areas to assess these additional issues. The observations and results of the review should be documented in their core functional area reports.

Below is an example of an additional area that could be considered for review:

- *Davis-Bacon Act (applicable for construction projects)*. Some NSF Facilities may include funding for construction requiring the Awardee to comply with the provisions of the Davis-Bacon Act. This Act requires that all laborers and mechanics employed by contractors and subcontractors on projects funded directly by or assisted in whole or in part by and through the Federal Government shall be paid wages at rates not less than those prevailing on projects of a character similar in the locality as determined by the Secretary of Labor in accordance with subchapter IV of Chapter 31 of Title 40, United States Code. Determine if the Awardee has procedures and policies in place to comply with the Davis-Bacon Act provisions when there are construction projects funded under the NSF award (www.dol.gov/compliance/laws/comp-dbra.htm).

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To view the *references* for this module, click [Human Resources Review References](#)
To view the *review questions* for this module, click [Human Resources Review Questions](#)
To view the *Acronym List*, click [List of Acronyms](#)

7. PROCUREMENT REVIEW MODULE

This module is used by the Writing Analyst to assess the administrative business systems that support procurement for the large Facility. It includes a list of references, supporting documentation, and framework for the review. The framework contains several guiding principles for the core functional area as well as practices that support each principle. Each practice contains review focus guidelines and a list of sample questions to aid the Writing Analyst in obtaining the information necessary to complete the review.

7.1 Scope of Review

The scope of this review is to assess the administrative business systems and organizational structure in place that supports the procurement functions for the large Facility. These are evaluated to determine if prescribed written policies and procedures are incorporated, internal controls are in place, and the systems are capable of supporting the administration of the Facility and are compliant with NSF expectations and award terms and conditions. In addition, this review assesses whether procurements are conducted competitively, positive efforts are made to use businesses led by underrepresented groups and whether detailed supporting documentation for procurements and purchases are maintained.

The Writing Analyst may refine the scope and review methodology presented in this module based on the unique aspects of the large Facility as well as the results of his/her scoping activities. Findings of previous internal and external reviews and audits should also be considered to avoid duplication of effort. For example, if the procurement system supporting the Facility was previously approved by the cognizant Federal agency, such as ONR, DCAA, or DHHS, the expert would take note and decrease the scope of this review. All proposed changes to the scope or review methodology should be coordinated with and approved by the BSR Manager.

7.2 Supporting Documentation

Early in the process, the Awardee is requested to provide the supporting documentation listed below as well as any other materials that they deem pertinent to support this CFA review. Documents received are assembled in review binders, provided to the Content Specialist for the desk review, and posted to the BSR SharePoint site.

Core Functional Area Management:

- Names and titles of key personnel responsible for providing procurement support for the Facility
- Description of duties for the above key personnel
- Organizational charts specific to procurement functions
- Information on continuing education opportunities for staff members responsible for procurement.

Policies and Procedures:

- Policies and procedures related to the acquisition process
- Delegation of authority for procurements and acquisitions with dollar thresholds and a description of internal controls to manage the delegated authority

- Copy or written description of any periodic purchasing reports provided to the Facility or awardee management
- Standard terms and conditions used by the Awardee for the various types of procurement instruments
- Small business program policy statement and implementation procedures and records of outreach efforts to ensure small business participation
- Any recent internal audits or reviews of procurement systems
- Copy of any recent reports for reviews conducted by other Federal agencies (e.g., procurement system review conducted by ONR)
- Flowcharts of facility business process -related to procurement
- Any other documentation identified by the Awardee as pertinent to this core functional area.

Procurement Transactions:

List of procurement transactions: subawards, purchasing card transactions, subcontracts, and purchase orders awarded for the most recently completed fiscal year for activities funded under the specific cooperative agreement.

7.2.1 Procedures

The common desk and site visit procedures for each module are listed in the introductory section of the *BSR Guide* Part II, above.

7.2.2 Framework Contents

PRINCIPLE 1. A MANAGEMENT STRUCTURE SHOULD BE IN PLACE TO CARRY OUT THE PROCUREMENT FUNCTIONS OF THE FACILITY.

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the procurement functions supporting the Facility.

Practice 1.2. Roles and duties of staff members responsible for procurement for the Facility should be clearly assigned and defined.

Practice 1.3. The Awardee should ensure that procurement staff members receive continuing educational opportunities to allow them to successfully support the large Facility.

PRINCIPLE 2. THE AWARDEE SHOULD HAVE ADEQUATE CONTROLS FOR PROCUREMENT ACTIONS.

Practice 2.1. Procurement responsibilities are segregated from the office requesting and accepting the deliverable and from the financial management responsibilities.

Practice 2.2. Controls should be in place to ensure that approval thresholds are appropriate and related delegations of authority are not exceeded without authorization.

Practice 2.3. Written Standards of Conduct should be maintained as required by 2 CFR 215.42 “Codes of Conduct.”

PRINCIPLE 3. THE AWARDEE SHALL ESTABLISH WRITTEN PROCUREMENT PROCEDURES IN ACCORDANCE WITH 2 CFR 215.44 “PROCUREMENT PROCEDURES.”

Practice 3.1. Written policies and procedures should include a provision to avoid the purchase of unnecessary items.

Practice 3.2. Written policies and procedures should require, where appropriate, an analysis of lease and purchase alternatives to determine which would be the most economical and practical procurement for the Federal government.

Practice 3.3. Written policies and procedures should require standards for solicitations for goods and services.

PRINCIPLE 4. THE AWARDEE SHOULD ENSURE THAT PROCUREMENTS ARE FAIR AND REASONABLE AND HAVE BEEN COMPETITIVELY SELECTED TO THE EXTENT PRACTICABLE.

Practice 4.1. Cost or price analysis should be performed and the basis for the cost or price should be documented in every file.

Practice 4.2. Procurement policies and procedures pursue competition to the maximum extent practicable, in compliance with 2 CFR 215.43.

Practice 4.3. The basis for contractor selection should be documented.

Practice 4.4. The Awardee’s contracting methods do not allow contract types that are precluded in Federal procurements nor awards to parties that have been excluded from receiving Federal procurements.

PRINCIPLE 5. THE AWARDEE SHOULD ACTIVELY SEEK DIVERSE RESOURCES FOR PROCURING AND ACQUIRING GOODS AND SERVICES.

Practice 5.1. Positive efforts are made to utilize small, minority-owned, disadvantaged, and/or woman-owned businesses whenever possible.

PRINCIPLE 6. THE AWARDEE SHOULD HAVE A SYSTEM IN PLACE FOR CONTRACT ADMINISTRATION TO ENSURE CONTRACTOR COMPLIANCE WITH THE TERMS, CONDITIONS, AND SPECIFICATIONS OF THE CONTRACT AND TO ENSURE ADEQUATE AND TIMELY FOLLOW-UP OF ALL PURCHASES.

Practice 6.1. The Awardees should have a process to evaluate subcontractor performance and document, as appropriate, whether or not the subcontractors met the terms, conditions, and specification of the subcontract.

PRINCIPLE 7. APPROPRIATE FLOW-DOWN PROVISIONS SHOULD BE INCLUDED IN ALL PROCUREMENTS.

Practice 7.1. Policies and procedures include the requirement to flowdown the appropriate provisions.

PRINCIPLE 8. AWARDEE SHOULD HAVE POLICIES AND PROCEDURES IN PLACE TO ADDRESS THE REQUIREMENTS OF THE SPECIFIC TERMS AND CONDITIONS OF THE NSF COOPERATIVE AGREEMENT RELATED TO PROCUREMENT AND SUBAWARDS.

Practice 8.1. Awardee procurements should adhere to the specific cooperative agreement terms and conditions related to procurements and subawards.

OTHER REVIEW AREAS

During the scoping process, there may be additional business system issues identified that need to be assessed but are not addressed in the module. In these cases, the Writing Analyst would follow an evaluation approach similar to that which was used on the other review focus area and document their methodology, observations, and results in their core functional area reports.

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To view the *references* for this module, click [Procurement Review References](#)
To view the *review questions* for this module, click [Procurement Review Questions](#)
To view the *Acronym List*, click [List of Acronyms](#)

8. PROPERTY AND EQUIPMENT REVIEW MODULE

This module is used by the Writing Analyst to assess the administrative business systems that support property and equipment for the large Facility. It includes a list of references, supporting documentation, and framework for the review. The framework contains several guiding principles for the core functional area as well as practices that support each principle. Each practice contains review focus guidelines and a list of sample questions to aid the Writing Analyst in obtaining the information necessary to complete the review.

8.1 Scope of Review

The scope of this review is to assess the administrative business systems and organizational structure in place that supports the property and equipment functions for the large Facility. The scope includes an assessment of the Awardee's process for acquiring and managing inventory and for disposing of nonexpendable property purchased with NSF funds. These are evaluated to determine if prescribed written policies and procedures are incorporated, internal controls are in place, and the systems are capable of supporting the administration of the Facility and are compliant with NSF expectations and award terms and conditions.

The Writing Analyst may refine the scope and review methodology presented in this module based on the unique aspects of the large Facility as well as the results of his/her scoping activities. Findings of previous internal and external reviews and audits should also be considered to avoid duplication of effort.

For example, if the property management system supporting the Facility was previously approved by the cognizant Federal agency, such as ONR, DCAA, or DHHS, the expert would take note and decrease the scope of this review. All proposed changes to the scope or review methodology should be coordinated with and approved by the BSR Manager.

8.2 Supporting Documentation

Early in the process, the Awardee is requested to provide the supporting documentation listed below as well as any other materials that they deem pertinent to support this CFA review. Documents received are assembled in review binders, provided to the Content Specialist for the desk review, and posted to the BSR SharePoint site.

Core Functional Area Management:

- Names and titles of key personnel responsible for management of Facility property
- Description of duties for the above key personnel
- Organizational charts specific to property management functions
- Information on continuing education opportunities for staff members responsible for property management.

Policies and Procedures:

- Awardee's property classification definitions
- Any screenshots of electronic systems that may be helpful in understanding the system
- List of personnel authorized to review, approve, and purchase property

- List of personnel authorized to enter, modify, or alter Facility property records
- Forms or checklists used for the property management function
- Copies of any recent reports for reviews conducted by other Federal agencies (e.g., property system reviews conducted by DCAA)
- Any recent internal audits or reviews of property systems
- Flowcharts of Facility business process related to property management

Property Reports and Transactions:

- A listing of all capitalized assets, (e.g., those with an acquisition cost of more than \$25,000 and a useful life greater than two years, including the acquisition document identifier, acquisition date, and cost)
- Most recent physical inventory report
- Reports of lost, damaged, or destroyed property (LDD)
- Listing of nonexpendable property for the Facility
- Copies of the last two physical inventory reports for the Facility
- Last fiscal year-end capitalized property inventory report.

8.2.1 Procedures

The common desk and site visit procedures for each module are listed in the introductory section of the *BSR Guide* Part II, above.

8.2.2 Framework Contents

PRINCIPLE 1. A MANAGEMENT STRUCTURE SHOULD BE IN PLACE TO CARRY OUT THE PROPERTY AND EQUIPMENT FUNCTIONS OF THE FACILITY.

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the property and equipment functions supporting the Facility.

Practice 1.2. Roles and duties of staff members responsible for property and equipment management for the Facility should be clearly assigned and defined.

Practice 1.3. The Awardee should ensure that staff members responsible for property and equipment management receive continuing educational opportunities to allow them to successfully support the large Facility.

Practice 1.4. The Awardee should have a delineation of responsibilities for the property and equipment functions to ensure checks and balances.

PRINCIPLE 2. THE AWARDEE SHOULD HAVE POLICIES AND PROCEDURES THAT COMPLY WITH FEDERAL REGULATIONS FOR ACQUISITION OF PROPERTY AND EQUIPMENT.

Practice 2.1. Existing policies and procedures should require classification for types of property.

Practice 2.2. Internal controls should be in place to ensure appropriate acquisition of property.

Practice 2.3. The Awardee should have adequate documentation for acquisition of Federally funded equipment.

PRINCIPLE 3. THE AWARDEE SHOULD HAVE POLICIES AND PROCEDURES THAT COMPLY WITH FEDERAL REGULATIONS AND REQUIREMENTS FOR THE USE AND DISPOSITION OF PROPERTY.

Practice 3.1. The organization adheres to Federal and organizational policies and procedures to ensure proper use of Federally funded property and equipment.

Practice 3.2. The Awardee should adhere to Federal and organizational policies and procedures to ensure proper disposition of Federally funded property and equipment.

PRINCIPLE 4. THE AWARDEE SHOULD HAVE A SYSTEM IN PLACE FOR SECURING AND MAINTAINING EQUIPMENT PURCHASED WITH FEDERAL FUNDS.

Practice 4.1. The Awardee should have policies and procedures in place to ensure that equipment purchased with Federal funds is maintained in good condition. The Awardee also should have a process in place to report lost, damaged, or stolen property to NSF.

Practice 4.2. Guidance for security and maintenance of property and equipment purchased with Federal funds should be provided to Subawardees.

PRINCIPLE 5. THE AWARDEE'S INVENTORY AND RECORDKEEPING PRACTICES SHOULD BE IN COMPLIANCE WITH FEDERAL REQUIREMENTS AND SHOULD BE MAINTAINED ACCURATELY IN A PROPERTY MANAGEMENT OR INVENTORY SYSTEM.

Practice 5.1. The Awardee should have an equipment inventory system that meets the requirements of 2 CFR 215.34.

Practice 5.2. The Awardee should have clear procedures for reconciling the inventory of equipment purchased with Federal funds.

PRINCIPLE 6. THE AWARDEE SHOULD HAVE A SYSTEM IN PLACE TO ENSURE COMPLIANCE WITH THE TERMS, CONDITIONS, AND SPECIFICATIONS OF THE AWARD RELEVANT TO PROPERTY MANAGEMENT.

Practice 6.1. The Awardee should have developed procedures to monitor compliance with the award terms, conditions, and specifications relevant to property management, and to inform appropriate staff members of these requirements.

OTHER REVIEW AREAS

During the scoping process, there may be additional business system issues identified that need to be assessed but are not addressed in the module. In these cases, the Writing Analyst would follow an evaluation approach similar to that which was used on the other review focus area and document their methodology, observations, and results in their core functional area reports.

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To view the *references* for this module, click [Property and Equipment Review References](#)

To view the *review questions* for this module, click [Property and Equipment Review Questions](#)

To view the *Acronym List*, click [List of Acronyms](#)

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APPENDIX A: LIST OF REFERENCES

This appendix identifies key documents that are important to the Writing Analysts in performing their review. Specifically, Table 2 includes OMB Circulars pertaining to Federal cost and administrative principles, NSF award related policies and procedures, and agency terms and conditions. The OMB materials are accessible at <http://www.whitehouse.gov/omb/circulars/index.html>.

NSF related materials, such as the *Proposal and Award Policies and Procedures Guide (PAPPG)* and the financial and administrative award terms and conditions are located on NSF's external website at <http://nsf.gov/bfa/dias/policy/index.jsp>.

Table 2 – References Abbreviations

Citations/Abbreviations Used in Modules	Full Name of Reference Document
Administrative Requirements	
2 CFR 215 (OMB Circular A-110)	Part 215—Uniform Administrative Requirements for Grants and Cooperative Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations
Cost Principles	
2 CFR 220 (OMB Circular A-21)	Part 220—Cost Principles for Educational Institutions
2 CFR 230 (OMB Circular A-122)	Part 230—Cost Principles for Non-Profit Organizations
FAR Part 31	Federal Acquisition Regulations, Contract Cost Principles and Procedures
Audit Requirements	
OMB Circular A-133	Office of Management and Budget Circular A-133, Audits of States, Local Governments and Non-Profit Organizations
NSF Terms and Conditions	
CAFATC	Cooperative Agreement Financial and Administrative Terms and Conditions
CA Supplemental FATC for Large Facilities	Cooperative Agreement Supplemental Financial and Administrative Terms and Conditions for Large Facilities
CA Supplemental FATC for Managers of FFRDCs	Cooperative Agreement Supplemental Financial and Administrative Terms and Conditions for Managers of Federally Funded Research and Development Centers
NSF Additional Guidance	
PAPPG	Proposal and Award Policies and Procedures Guide (PAPPG)
GPG	Proposal and Award Policies and Procedures Guide, Part I, Grant Proposal Guide (GPG)
AAG	Proposal and Award Policies and Procedures Guide, Part II, Award and Administration Guide (AAG)
Large Facilities Manual	Large Facilities Manual
ARRA Guidance	
ARRA TC	National Science Foundation American Recovery and Reinvestment Act of 2009 Terms and Conditions
OMB Guidance on ARRA	Office of Management and Budget Guidance on the American Recovery and Reinvestment Act of 2009

To view the **references** relevant to your area, click on the appropriate link:

- [General Management Review References](#)
- [Award Management Review References](#)
- [Budget and Planning Management Review References](#)
- [Financial Management Review References](#)
- [Financial Reporting Review References](#)
- [Human Resources Review References](#)
- [Procurement Review References](#)
- [Property and Equipment Review References](#)

General Management Review References

The Reference section lists some of the primary NSF documents and Federal regulations used by the Writing Analysts to assess the business systems for this CFA. In addition, the Writing Analyst should also refer to the guidance documents in Table 2 of the *BSR Guide* and apply the applicable references for their review:

- [2 CFR 215.53](#), Retention and Access Requirements for Records
- [OMB Circular A-133](#), Audits of States, Local Government and Non-Profit Organizations
- [AAG Chapter I](#), Exhibit I-1, Statutes, Executive Orders, and Other Directives
- [AAG Chapter IV](#), Grantee Standards
- [AAG Chapter VI](#), Other Post Award Requirements and Considerations
- [NSF Large Facilities Manual](#)
- [Terms and Conditions](#), Applicable NSF Award Terms and Conditions

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To view the *Acronym List*, click [List of Acronyms](#)

Award Management Review References

The Reference section lists some of the primary NSF documents and Federal regulations used by the Writing Analysts to assess the business systems for this CFA. In addition, the Writing Analyst should also refer to the guidance documents in Table 2 of the Guide and apply the applicable references for their review:

- [2 CFR 215.25](#), Revision of Budget and Program Plans
- [OMB Circular A-133](#), Audits of States, Local Government and Non-Profit Organizations
- [Proposal and Award Policies and Procedures Guide \(PAPPG\), Part II](#), Award Administration Guide (AAG)
- [Terms and Conditions](#), Applicable NSF Award Terms and Conditions

To return to this *module review*, click [Award Management Review Module](#)

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To view the *Acronym List*, click [List of Acronyms](#)

Budget and Planning Management Review References

The Reference section lists some of the primary NSF documents and Federal regulations used by the Writing Analysts to assess the business systems for this CFA. In addition, the Writing Analyst should also refer to the guidance documents in Table 2 of the Guide and apply the applicable references for their review:

- [2 CFR 215](#), Uniform Administrative Requirements for Grants and Cooperative Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations
 - [2 CFR 220](#), Cost Principles for Educational Institutions
 - [2 CFR 230](#), Cost Principles for Non-Profit Organizations
 - [AAG Chapter II.C](#), Changes in the Grant Budget
 - [NSF Budget Request to Congress](#), Facilities and MREFC Sections
 - [NSF Large Facilities Manual](#)
 - [Terms and Conditions](#), Applicable NSF Award Terms and Conditions
-

To return to this *module review*, click [Budget and Planning Review Module](#)

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Financial Management Review References

The Reference section lists some of the primary NSF documents and Federal regulations used by the Writing Analysts to assess the business systems for this CFA. In addition, the Writing Analyst should also refer to the guidance documents in Table 2 of the *BSR Guide* and apply the applicable references for their review:

- [2 CFR 215](#), Uniform Administrative Requirements for Grants and Cooperative Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations
 - [2 CFR 220](#), Cost Principles for Educational Institutions
 - [2 CFR 230](#), Cost Principles for Non-Profit Organizations
 - [48 CFR 9900](#), Cost Accounting Standards
 - [FAR Part 31](#), Contract Costs Principles and Procedures
 - [OMB Circular A-133](#), Audits of States, Local Government and Non-Profit Organizations
 - [AAG Chapter III](#), Financial Requirements and Payments
 - [AAG Chapter IV](#), Grantee Standards
 - [AAG Chapter V](#), Allowability of Costs
 - [Terms and Conditions](#), Applicable NSF Award Terms and Conditions
-

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To view the *review questions* for this module, click [Financial Management Review Questions](#)

To view the *Acronym List*, click [List of Acronyms](#)

Financial Reporting Review References

The Reference section lists some of the primary NSF documents and Federal regulations used by the Writing Analysts to assess the business systems for this CFA. In addition, the Writing Analyst should also refer to the guidance documents in Table 2 of the *BSR Guide* and apply the applicable references for their review:

- [2 CFR 215.21](#), Standards for Financial Management Systems
 - [2 CFR 215.22](#), Payment
 - [2 CFR 215.24](#), Program Income
 - [2 CFR 215.52](#), Financial Reporting
 - [OMB Circular A-133](#), Audits of States, Local Government and Non-Profit Organizations
 - [AAG Chapter III](#), Financial Requirements and Payments
 - [AAG Chapter VI.E](#), Program Income
 - [NSF FastLane Guidance](#)
 - [Terms and Conditions](#), Applicable NSF Award Terms and Conditions
-

To return to this *module review*, click [Financial Reporting Review Module](#)

To view the *review questions* for this module, click [Financial Reporting Review Questions](#)

To view the *Acronym List*, click [List of Acronyms](#)

Human Resources Review References

The Reference section lists some of the primary NSF documents and Federal regulations used by the Writing Analysts to assess the business systems for this CFA. In addition, the Writing Analyst should also refer to the guidance documents in Table 2 of the *BSR Guide* and apply the applicable references for their review:

- [Title VI of the Civil Rights Act of 1964](#) (42 U.S.C. 2000d et seq. and 45 CFR 611)
 - [Rehabilitation Act of 1973, Section 504](#) (29 U.S.C. 794 and 45 CFR 605)
 - [Title IX of the Education Amendments Act of 1972](#) (20 U.S.C. 1681 et seq. and 45 CFR 618)
 - [Age Discrimination Act of 1975](#) (42 U.S.C. 6101 et seq. and 45 CFR 617)
 - [Davis-Bacon Act of 1931](#) (40 U.S.C. 276a et seq.)
 - [Drug-Free Workplace Act](#) (45 CFR 630)
 - [Executive Order 11246](#) (41 CFR 60)
 - [Executive Order 12250](#) (28 CFR 42.401 et seq.)
 - [AAG Chapter VI](#), Other Post Award Requirements and Considerations
 - [GPG Chapter II](#), Exhibit II-3: Drug-Free Workplace Certification
 - [GPG Chapter II](#), Exhibit II-6: Nondiscrimination Certification
 - [Terms and Conditions](#), Applicable NSF Award Terms and Conditions
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To return to this *module review*, click [Human Resources Review Module](#)

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Procurement Review References

The Reference section lists some of the primary NSF documents and Federal regulations used by the Writing Analysts to assess the business systems for this CFA. In addition, the Writing Analyst should also refer to the guidance documents in Table 2 of the *BSR Guide* and apply the applicable references for their review:

- [AAG Chapter IV.C](#), Procurement Standards
 - [2 CFR 220](#), Cost Principles for Educational Institutions
 - [2 CFR 230](#), Cost Principles for Non-Profit Organizations
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- [FAR Part 31](#), Contract Costs Principles and Procedures
 - [OMB Circular A-133](#), Audit of States, Local Governments and Non-Profit Organizations
 - [Terms and Conditions](#), Applicable NSF Award Terms and Conditions
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Property and Equipment Review References

The Reference section lists some of the primary NSF documents and Federal regulations used by the Writing Analysts to assess the business systems for this CFA. In addition, the Writing Analyst should also refer to the guidance documents in Table 2 of the Guide and apply the applicable references for their review:

- [2 CFR 215.30-.37](#), Property Standards
 - [AAG Chapter IV.D](#), Property Management Standards
 - [AAG Chapter V](#), Allowability of Costs
 - [OMB Circular A-133](#), Audit of States, Local Governments and Non-Profit Organizations
 - [Terms and Conditions](#), Applicable NSF Award Terms and Conditions
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APPENDIX B: LIST OF REVIEW QUESTIONS

To view the **review questions** relevant to your area, click on the appropriate link:

- [General Management Review Questions](#)
- [Award Management Review Questions](#)
- [Budget and Planning Review Questions](#)
- [Financial Management Review Questions](#)
- [Financial Reporting Review Questions](#)
- [Human Resources Review Questions](#)
- [Procurement Review Questions](#)
- [Property and Equipment Review Questions](#)

General Management Review Questions

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the general management functions supporting the Facility.

Suggested Questions

- Does the Facility's management staff have the authority to commit the organization or does that authority reside in central administration?
- Does the organizational chart reflect the key positions of the Awardee organization? Of the Facility?
- Is there a management practice in place that requires a second level of supervisory review above the immediate supervisor for any position in the organization? For example, are there management decisions that require second level supervisor concurrence (e.g., major spending actions, hiring and personnel review decisions, significant changes in operation)? If not, why not?

Practice 1.2. Roles and duties of staff members responsible for general management of the Facility should be clearly assigned and defined.

Suggested Questions

- What are the different roles and duties assigned to staff members responsible for the general management for the Facility? Are they clearly defined?
- Who is responsible for the administrative compliance of the activities of the Facility? Who do they report to?
- Do individuals responsible for general management have the appropriate level of authority required to accomplish their duties?
- If there are questions of a legal nature that need to be resolved, what is the process for the project management team to obtain this advice?

Practice 1.3. The Awardee should have training and development processes and practices to address existing or anticipated skill or knowledge gaps.

Suggested Questions

- Who participates in determining the organization's training and development needs?
- What strategies are being implemented to help ensure that employees have or will continue to have the competencies and skills for the job?

- How are training costs determined and paid?
- What training delivery systems are used (*e.g.*, on-the-job training, web-based learning, classroom training, conferences, satellite locations)?
- How is training evaluated?
- How do managers get trained, and who do they turn to when they have a problem or need mentoring?

Practice 2.1. A system should be in place for long-term planning for the large Facility.

Suggested Questions

- What strategic planning activities take place in support of the large Facility?
- Are there new trends that could affect the Awardee or new opportunities the Awardee can take advantage of? If so, how are these trends taken into account? How does the strategic planning process provide relevant stakeholders with the opportunity to provide input?
- If the Awardee has received or is expecting to receive ARRA funds, does the strategy include specific provisions for overseeing ARRA-funds in accordance with the requirements of the Act? Were the appropriate stakeholders able to provide input into the ARRA-related strategic plans? Are these plans communicated throughout the organization?
- Does the strategic planning process ensure that the Awardee considers inputs such as new research/science trends, research user's needs, and recent innovations?
- How are the vision, mission, and strategic goals communicated across the organization?
- Does the Awardee have a committee to review strategic planning? Who are the members of the review committee for strategic planning?
- What is the process for updating and revising strategic plans?

Practice 2.2. The Awardee should have documented procedures to measure the performance of various business systems that support the large Facility.

Suggested Questions

- Is there an overall performance measurement system in place? If so, what is it?
- What are the various tools used to measure performance?
- Are the performance measures balanced by focusing on the business results and satisfaction of employees and the user community?
- How do performance measures focus the Awardee's attention on the critical issues?
- How do the performance measures address the strategic, operational, and individual levels of the Awardee?
- How are performance measures used by managers?

Practice 3.1. The Awardee should have a program in place to ensure compliance with regulatory issues.

Suggested Questions

- What compliance programs are in place at the organization?
- How are the compliance policies and procedures communicated to employees?
- Are there any unresolved compliance issues from past reviews? If so, what are they?
- Were any adverse working conditions reported during site visits or internal audits? If so, what did they involve?
- Are there any outstanding recommendations? If so, what are they?
- How does the Awardee ensure that employees receive and understand compliance information?
- How is the internal audit plan developed for the coming year? Who approves it?

Practice 3.2. The Awardee should have written policies and procedures to address the conduct of the external independent audit and the internal audit responsibilities

Suggested Questions

- Is there an internal audit function in place? If so, how does the Awardee ensure it is sufficiently independent from management? If there is no internal audit function, what procedures are in place to ensure that the policies, practices, and systems comply with Federal and NSF requirements?
- How does an employee submit an anonymous concern to the internal auditor or the NSF OIG? Do the Awardee's policies and procedures delineate points of contact and lines of communication for persons making allegations of scientific or administrative misconduct?
- Are there internal audits or reviews that are directly related to the large Facility? If so, what are they? If there were findings, what were they?
- Are there any outstanding internal or external audit issues that have not been resolved? If so, what are they?
- What is the process for addressing and resolving issues identified in internal and external audits? Who is involved?
- At what point would the Awardee notify the NSF OIG that they had received evidence of a false claim or misuse of funds? Would the Awardee conduct the initial review or would they notify the NSF OIG immediately for the OIG to pursue the investigation?

Practice 4.1. The Awardee should have a system in place to comply with ethical standards of conduct.

Suggested Questions

- What policies and procedure are in place related to standards of conduct?
- How are the ethical policies and procedures communicated to employees?
- Do employees formally acknowledge receipt of the policies and procedures?
- Who reviews financial disclosures?
- What enforcement mechanisms are in place?
- What is legal counsel's role concerning standards of conduct?

Practice 4.2. The Awardee should have conflict of interest (COI) policies and procedures.

Suggested Questions

- How does the Awardee ensure that employees receive and understand COI information?
- How does the COI policy incorporate adequate enforcement mechanisms and provide for sanctions where appropriate?
- Are COI acknowledgments updated on a periodic basis? If so, when and what is the process? Who is responsible for maintaining this information?

Practice 5.1. Self-governing committees should be in place to provide guidance, direction, and oversight for the Facility.

Suggested Questions

- Is there a charter in place that includes mission, issue resolution mechanisms, names and titles of participants, and frequency of meetings?
- What is the institutional oversight function for the Facility and who is involved in it? Is NSF appropriately informed?
- How does the Awardee's oversight board foster adequate governance and promote accountability?
- How are advisory and oversight committees sufficiently independent from management to constructively challenge management's decisions and act effectively?

Practice 6.1. Record retention policies and procedures should be in place and follow the requirements of 2 CFR 215.53.

Suggested Questions

- How does the Awardee ensure that its records retention policies are compliant with Federal regulations? What systems are in place to ensure that the Awardee will retain financial records, supporting documentation and statistical records for a period of at least 3 years following the financial closeout of the cooperative agreement?
- What award records are maintained, in what format, and for how long?
- How are records disposed of? When are they scheduled for destruction?
- Who is responsible for retention, management, and disposition of records? Who has access to Facility-related records?
- If NSF were seeking a document for an award that expired less than 3 years ago, is the institution able to retrieve the record? Demonstrate the retrieval system.

Practice 7.1. Policies and procedures that support the large Facility should be in place to address cybersecurity and IT issues.

Suggested Questions

- What IT activities support activities of the large Facility?
- Are IT policies and procedures documented?
- Who is assigned to address IT issues within the Facility?
- Is there a cybersecurity plan for Facility data?
- Is there offsite backup storage of critical data? Is the backup regularly maintained?

Practice 7.2. The Awardee should have a system to assure the security of buildings, equipment, information systems, and personal safety.

Suggested Questions

- Does the Facility have an information and Facility security officer to oversee the security classification system? What are their roles and responsibilities?
- What safety policies and procedures are in place?
- How does the Awardee ensure that the staff members responsible for safety are appropriately trained?
- How often are safety procedures reviewed?
- Have there been any safety incidences at the Facility? If so, how were these handled? Was NSF notified?
- Has the Awardee contacted NSF in an emergency? How effective was the process? If there were problems, were the issues addressed?
- Is the emergency communication system tested periodically?

To return to this *module review*, click [General Management Review Module](#)

To view the *references* for this module, click [General Management Review References](#)

To view the *Acronym List*, click [List of Acronyms](#)

Award Management Review Questions

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the award management functions supporting the Facility.

Suggested Questions

- Which staff members are responsible for the Facility award administration?
- What internal review assessment does the Awardee perform to ensure that the leadership and management team are performing well?
- Does the Facility's award management staff have the authority to commit the organization or is that authority vested in central administration?
- Does the organizational chart reflect the key positions?
- How are lines of authority and responsibility delineated?
- Are there any aspects of the management structure that might lead to a conflict of interest? If so, what are they?

Practice 1.2. Roles and duties of staff members responsible for award management of the Facility awards should be clearly assigned and defined.

Suggested Questions

- What are the different roles and responsibilities of staff members assigned to award management?
- Do individuals responsible for award management have the appropriate level of authority required to accomplish their duties?
- Are the duties of each key position clearly defined?

- How are staff members made aware of their specific duties and responsibilities?

Practice 1.3. The Awardee should ensure that award management staff members receive continuing educational opportunities to allow them to successfully manage Federal awards.

Suggested Questions

- How is the award management staff made aware of NSF expectations and changes to the NSF award?
- How are the NSF expectations conveyed to administrative staff members outside the centralized business office?
- What training sessions on compliance with Federal programs are conducted for the staff?

Practice 2.1. The Awardee should have established procedures to monitor compliance with the Federal regulations and the terms and conditions of the award.

Suggested Questions

- What mechanisms does the Awardee have in place to monitor the NSF websites, publications, and policy issuances to keep current?
- Does the Awardee have a channel of communication with the NSF Grants and Agreements Officer? The NSF Program Officer?
- How do the processes for the management of NSF awards differ from those applicable to awards received from other agencies?
- Are there any terms or conditions that present a challenge for the organization to be in full compliance?
- What is the process for distributing the information on the award compliance issues within the Facility?
- Does the award management team hold scheduled meetings with the Facility staff to discuss award management issues and to provide updates on Federal policy and requirements?
- Are there any special compliance oversight programs in place to monitor ARRA funding (*e.g.*, special reporting, Buy America Act)? What actions has the Awardee taken to disseminate and highlight the ARRA-terms and conditions?

Practice 2.2. The Awardee should have procedures to implement the Federal expanded authorities as provided in 2 CFR 215.25, including:

Suggested Questions

- Who is responsible for coordinating the prior approval submissions? Do they have the delegated authority to submit these requests on behalf of the Awardee?
- Have there been any instances where NSF has denied a prior approval request? If so, what were the circumstances?

Practice 2.3. The Awardee should have a system in place to ensure adequate delivery of required reports and other deliverables.

Suggested Questions

- How does the Awardee keep track of report deadlines to ensure that all reports are submitted in a timely manner?

- How does the Awardee maintain an inventory of reports submitted to NSF?
- How does the Awardee verify that NSF received the reports?
- What are the Awardee's review and approval procedures for reports prior to submission to NSF?

Practice 3.1. Systems should be in place for adequate post-award monitoring of subawards.

Suggested Questions

- How does the Awardee monitor subaward report requirements and ensure that deliverables are received on schedule and on budget?
- If the required reports (monthly status, annual progress, final technical) are not received in a timely manner, what actions does the Awardee take to resolve the delinquency with the subrecipient?
- How does the Awardee monitor financial and program performance of subrecipients?
- Does the Awardee require audit or financial reviews of subrecipients? When are these required? How are questioned costs and issues of noncompliance addressed?
- When subrecipients are required to have an A-133 audit, how does the Awardee follow up on the findings?
- Have any subawards been suspended or terminated? What were the circumstances and was the Awardee able to recover damages?
- How does the Awardee monitor subrecipient compliance with the ARRA reporting requirements for those subrecipients that received Recovery Act funding? How do you ensure that the subrecipients reports ARRA funded expenditures within ten days following the end of each quarter?

To return to this *module review*, click [Award Management Review Module](#)

To view the *references* for this module, click [Award Management Review References](#)

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Budget and Planning Review Questions

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the budget planning functions supporting the Facility.

Suggested Questions

- Which staff members are in place to execute the budget planning process for the Facility?
- Does the organizational chart reflect the key positions?
- How are lines of authority and responsibility delineated?
- How many staff members are involved in the budget and planning process for the Facility?
- How are the annual budgets proposed by a particular department or area assessed for reasonableness?

Practice 1.2. Roles and duties of staff members responsible for budget planning for the Facility awards should be clearly assigned and defined.

Suggested Questions

- What are the different roles and duties assigned to the staff members responsible for the budget and planning process? Are they clearly defined?
- Who has the responsibility for managing this budget and planning process?
- Do individuals responsible for the budget and planning process have the appropriate level of authority required to accomplish their duties?
- Are there any aspects of the management structure that might lead to a conflict of interest? If so, what are they?

Practice 1.3. The Awardee should ensure the staff members responsible for budget and planning receive continuing educational opportunities to allow them to successfully carry out their duties.

Suggested Questions

- What continuing educational opportunities are available to budget and planning staff members to help them perform their required duties?
- How are NSF expectations and changes to the NSF award conveyed to the budget and planning staff?

Practice 2.1. The Awardee should have written processes and procedures, and use historical database information in developing operation budgets for the Facility.

Suggested Questions

- What is the budget formulation process for the large Facility?
- Is the budget formulation process documented in writing?
- How does the budget staff communicate the portion of the budget formulation process that is not written? How is consistency ensured?
- How does program income/user fees factor into the budget formulations?
- Have there been any issues related to the budget formulation process identified in an internal or external audit? If so, how did the Awardee respond? What is the status of any outstanding issues? Is the Awardee making progress on resolving the outstanding issues consistent with the audit recommendations?

Practice 2.2. The Awardee should establish a process for developing operational budget estimates that are reasonable and consistent with the scope and activity of the Facility.

Suggested Questions

- What kind of data does the Awardee use to formulate the budgets for the Facility? What estimate bases are used for budget planning?
- What tools are used by the Facility to develop realistic estimates/budgets (e.g., actual cost analysis, historical data, standard rates, RS Means CostWorks software for estimating construction, EPS for estimating maintenance, repair, and alteration)?
- Are the Awardee budget staff aware of the short-term nature of ARRA appropriations?

- Do ARRA budgets incorporate plans to quickly ramp-up, execute, and ramp-down project implementation in order to complete ARRA-funded projects within the required timeframe?
- Does the Facility have expert staff members or use consultants to prepare budget estimates?
- Are budget estimates reviewed by an independent entity, such as a review panel or an oversight body, before submission to NSF? Why or why not?
- How are subrecipient budget requests incorporated into the Facility budget?
- What interaction occurs between the Awardee and the NSF Program Officer on the budget? Is there a formal process established?

Practice 2.3. The Facility program staff should be integrated into the budget planning process.

Suggested Questions

- In what way are Facility program managers involved in budget formulation?
- Does the budget consider planning for maintenance and replacement of long-lived assets? If not, how does the Awardee propose to address these issues?
- Do Facility program staff members receive adequate assistance and support from budget staff members to carry out their budget duties?
- Is the budget process “bottom up” or “top down”?

Practice 2.4. The large Facility budget should be aligned with the annual and long-term goals and objectives of the Facility.

Suggested Questions

- How does the Facility management align budgets with annual and long-term objectives of the Facility?
- How does the Facility management foster a link between the budget and planning process and the overarching goals of the Facility?
- How are competing priorities addressed?
- Are performance metrics incorporated in the budget planning process?

Practice 3.1. The Awardee should have procedures for tracking and revising the budget.

Suggested Questions

- How are the budgets tracked against actual expenditures? By whom and how often?
- Are the staff aware of the requirement to monitor ARRA funding to ensure that allowable expenditures begin within 12 months of the award date?
- What are the internal controls in place to avoid cost overruns?
- Does the Awardee take proactive steps to monitor budgets, such as verifying fund availability before approving a purchase? If so, who reviews and verifies fund availability? What happens if funds are not available?

- Can funds be shifted between budget categories (*e.g.*, line items, projects) during a fiscal year? If so, at what management level are reprogramming decisions made and authorized?
- What tools (*e.g.*, forms) are used to facilitate and document the reprogramming process?
- How are deviations from budget estimates identified and handled during the year?
- How do Facility program managers personally track their expenditures against budgets?
- How are Facility program management held accountable for deviations in scope that impact the budget?
- If Facility program managers are not responsible for budget monitoring, who is responsible?
- Does the Facility program staff receive adequate assistance and support from budget staff members to develop and execute their budgeting duties?

Practice 3.2. The Awardee should establish procedures for year-end closeout.

Suggested Questions

- How does the Awardee close out at the end of the fiscal year and how are end-of-the-year reports developed and delivered to NSF? Is there an established timeline for this process?
- What is the impact of a large residual balance on future budget requests? When would a large residual balance affect the budget request?
- Does the Awardee carry over funds across fiscal years? If yes, what is the process for informing NSF and reallocating these funds?

Practice 3.3. The Awardee should have systems to adequately and accurately track budgets and expenditures for all the lifecycle stages of the Facility.

Suggested Questions

- What is the relationship/interface between the formal Awardee financial system and offline and/or independent budgeting system maintained by the Facility administrators?

Practice 3.4. Regular budgeting and financial reports should be produced for Facility management, program, and budget personnel.

Suggested Questions

- Is the level of detail in the financial status reports sufficient for the intended audience?
- Are regular financial management reports provided to Facility managers?
- How often are such reports produced? Are they timely?
- Is there a formal process for Facility managers to review and discuss the financial management reports?

Practice 4.1. The Awardee should plan, to the extent possible, for unforeseen circumstances affecting Facility budgets.

Suggested Questions

- Does the Facility budget include allowances for delays or irregularities?
- Does the organization have criteria for use of contingency funds? If so, what is the process for approving and tracking the use of these funds?
- Are these allowances reviewed regularly and adjustments tracked against the baseline?
- What is the process for budget adjustments when budget category allowances are exhausted but needs arise?

Practice 5.1. The Awardee should have procedures in place to monitor compliance with the reporting requirements relevant to budget and planning.

Suggested Questions

- What reports are required by the cooperative agreement?
- Are the ad hoc reports submitted to external stakeholders timely and complete?
- Does the Awardee provide budget and other reports in the format and time frame outlined in the award agreement?
- Are the budget reports required by the cooperative agreement sufficient for the NSF Program Officer to manage the program? If not, what additional reports would the NSF Program Officer require?

To return to this *module review*, click [Budget and Planning Review Module](#)

To view the *references* for this module, click [Budget and Planning Management Review References](#)

To view the *Acronym List*, click [List of Acronyms](#)

Financial Management Review Questions

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the financial management functions supporting the Facility.

Suggested Questions

- Which staff members are in place to execute the financial management for the Facility?
- Does the Facility's financial management staff report to central administration?
- Does the organizational chart reflect the key positions?
- How are lines of authority and responsibility delineated?

Practice 1.2. Roles and duties of staff members responsible for financial management of the Facility awards should be clearly assigned and defined.

Suggested Questions

- What are the different roles and duties assigned to staff members responsible for financial management?
- Who has the responsible for financial management for the Facility?

- How are these positions integrated within the overall Awardee's management structure?
- Do individuals responsible for financial management have the appropriate level of authority required to accomplish their duties?
- Are the duties of each key position defined?

Practice 1.3. The Awardee should ensure that financial management staff members receive continuing educational opportunities to allow them to successfully manage Federal awards.

Suggested Questions

- What continuing educational opportunities are offered to the financial management staff in order for them to perform their required duties?
- How is the financial management staff made aware of NSF expectations and changes to the NSF award?

Practice 1.4. The Awardee should ensure an appropriate segregation of duties for staff members performing the financial management functions for the large Facility.

Suggested Questions

- How does the Awardee ensure adequate segregation of duties?
- How does the Awardee exercise effective control and accountability for all funds?
- How does the Awardee document appropriate approvals?

Practice 2.1. The Awardee should have systems in place to ensure compliance with mandated Federal and award-specific requirements, for cost principles, audit and administrative requirements, and other financial compliance regulations.

Suggested Questions

- Do the accounting procedures identify and segregate unallowable costs on the NSF award?
- When did the Awardee last review and update the accounting policies and practices?

Practice 2.2. The Awardee should have a system in place to ensure that costs charged to the NSF award benefit and are properly charged to the sponsored project account. Costs should be consistently treated as direct or indirect costs. Allocated costs (*e.g.*, fringe benefits, F&A, or IDC) should be equitably distributed. Internally allocated costs, such as recharge centers, should be periodically reviewed and approved by the Awardee.

Suggested Questions

- What system is in place to determine whether costs charged to the NSF award are reasonable and allocable?
- Who is authorized to incur costs for the award? Are there varying levels of approvals depending on cost thresholds?
- Are there procedures for approving and documenting, correcting, adjusting, and closing credit and transfer entries, as well as reconciling subsidiary cost ledgers and cost objectives to the general ledger accounts?
- Are there significant charges to the NSF award for recharge rates or specialized service centers? If so, how often are the rates calculated?

Practice 2.3. The Awardee should have written policies and procedures defining allowability of costs that are consistent with Federal cost principles and the NSF award.

Suggested Questions

- What controls are in place to identify and segregate unallowable costs?
- Have there been any recent audit findings that have identified unallowable costs charged to a sponsored agreement?
- What are the procedures in place to ensure that ARRA expenditures do not violate the limitation of funds clause in the ARRA special terms and conditions?

Practice 2.4. The Awardee should have policies and systems that differentiate costs as direct and indirect based on applicable Federal regulation and the terms of the negotiated IDC rate agreement.

Suggested Questions

- How does the Awardee's system identify whether costs are to be treated as direct or indirect?
- Is the accounting for IDCs in accordance with the established rate methodology?
- Are there occasions when rates not consistent with the negotiated rate agreement are used? If so, what are these and what is the reason?

Practice 2.5. The Awardee should have a system in place for accurate and consistent recording and reporting of direct time and effort costs charged to the NSF award.

Suggested Questions

- How are the time and effort reports submitted? How are they maintained?
- Who is responsible for reviewing the time and effort reports charged to the NSF award?
- Are the fringe benefits based on a negotiated fringe benefit rate or are they charged based on actual costs? Are they accrued or are payments made as actual charges are incurred? If they are claimed as incurred, does the Awardee have outstanding unpaid liabilities for fringe benefits?

Practice 3.1. Charges booked to the project cost ledger for the NSF award should be supported by adequate source documentation.

Suggested Questions

- Are there any limitations on the allowable costs for the award?
- Does the Awardee verify that the transactions charged to the award have adequate supporting documentation? How?
- Where is the supporting documentation kept? How long does the Awardee keep the files?

Practice 4.1. The Awardee should have procedures to monitor compliance with the award terms, conditions, and specifications relevant to financial management.

Suggested Questions

- What systems are in place to ensure compliance with the financial management award terms?

- If the Awardee has received ARRA funding, has it developed policies and procedures to ensure that ARRA-specific financial management terms are adhered to?
- How does the Awardee disseminate information concerning financial management terms and conditions to staff?

To return to this *module review*, click [Financial Management Review Module](#)

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Financial Reporting Review Questions

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the financial reporting functions supporting the Facility.

Suggested Questions

- Does the organizational chart reflect the key positions?
- How are lines of authority and responsibility delineated?
- Are there any situations in the management structure that might lead to a conflict of interest? If so, what are they?

Practice 1.2. Roles and duties of staff members responsible for FFR preparation and cash management for the Facility awards should be clearly assigned and defined.

Suggested Questions

- What are the different roles and duties assigned to staff responsible for the financial reporting process? Are they clearly defined?
- Who has the responsibility for managing this financial reporting process?
- Do individuals responsible for the financial reporting process have the appropriate level of authority required to accomplish their duties?

Practice 1.3. The Awardee should ensure that financial reporting staff members receive continuing educational opportunities to allow them to successfully manage Federal awards.

Suggested Questions

- What continuing educational opportunities are offered to financial reporting staff members to allow them to perform their required duties?
- How is financial reporting staff made aware of NSF expectations and changes to the NSF award?

Practice 2.1. The Awardee should have documented policies and procedures related to the cash request and FFR preparation processes.

Suggested Questions

- What is the FFR preparation process? What is the cash request process?
 - Who is involved?
 - Where does the financial information come from?
 - Are there any shadow systems that provide financial information?
 - Who reviews the FFR report before it is released to the Foundation?
 - Are there any recurring manual adjustments made to FFR? If yes, what is the reason?

- Are processes different for reporting ARRA-expenditures on the FFR? If yes, what are the processes?
- If audit findings revealed concerns with the financial reporting system, what steps have been taken to reconcile the issues?

Practice 3.1. The organization should have a system in place to ensure proper advance payment or reimbursement requests from the sponsor.

Suggested Questions

- How does the Awardee determine cash requirements for the purpose of advance payment requests? What systems does the organization have in place to support these requests?
- Who prepares and submits the cash requests and how frequently?

Practice 4.1. The organization should have a system in place that identifies the link between the FFR amounts and the general ledger.

Suggested Questions

- How are the FFR expenditure totals generated?
- Did the Awardee earn interest income or program income from Federal funds? How were these funds used?

Practice 5.1. Responsibilities for access and permissions to the Financial Functions for FFR preparation and cash requests are controlled and segregated.

Suggested Questions

- Who is responsible for assigning permissions to Financial Function users? What is the process and how is it controlled?
- Do permission assignments support the proper segregation of duties?
- Is the Financial Functions permissions list up to date? Does the Awardee review the list periodically?

Practice 6.1. The Awardee has procedures in place to monitor compliance with the award terms, conditions, and specifications relevant to financial reporting.

Suggested Questions

- What is the practice of disseminating information on the terms and conditions related to this core functional area?
- What systems are in place to ensure compliance with award terms and conditions related to this core functional area?

To return to this *module review*, click [Financial Reporting Review Module](#)

To view the *references* for this module, click [Financial Reporting Review References](#)

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Human Resources Review Questions

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the human resource functions supporting the Facility.

Suggested Questions

- Which staff members manage the human resource responsibilities for the Facility? Is there a remote site? If so, who provides the HR services to it?
- Does the Facility's administrator have independent authority to hire personnel?
- Does the organizational chart reflect the key positions?
- How are lines of authority and responsibility delineated?
- Are there any situations in the management structure that might lead to a conflict of interest? If so, what are they?

Practice 1.2. Roles and duties of staff members responsible for human resources for the Facility should be clearly assigned and defined.

Suggested Questions

- What are the different roles and responsibilities of staff members assigned to the HR needs of the Facility? Are these roles centralized or decentralized?
- Do individuals responsible for HR management have the appropriate level of authority required to accomplish their duties?
- Are the duties of each key position clearly defined?
- How is personnel staff made aware of their specific duties and responsibilities?

Practice 1.3. The Awardee should ensure that HR staff members receive continuing educational opportunities to allow them to successfully support the large Facility.

Suggested Questions

- What continuing educational opportunities are offered to HR staff to allow them to perform their required duties?
- How is HR staff made aware of NSF expectations and changes to the NSF award?

Practice 2.1. The Awardee should have mechanisms in place to ensure applicants and employees are aware of the organization's nondiscrimination policies and practices.

Suggested Questions

- Does the organization have a written procedure outlining their self-certification process?
- What are the organization's nondiscrimination policies and procedures?
- How does the organization communicate these to applicants and employees?
- Are notices displayed prominently and in reasonable numbers?
- Are the communication tools and mechanisms adequate to reach all employees, including those with disabilities or with limited English proficiency?

Practice 2.2. The Awardee should have mechanisms in place to train selection officials and managers in their responsibilities in complying with nondiscrimination policies and practices.

Suggested Questions

- How does the organization communicate its nondiscrimination policies and procedures to managers and selecting officials?

- Are managers and selecting officials aware of their responsibilities and the resources available to them to carry out these responsibilities?
- Are managers and selecting officials held accountable for ensuring that they are carrying out their responsibilities? If so, how?

Practice 2.3. The Awardee should have mechanisms in place to comply with specific nondiscrimination practices as described in relevant Federal regulations (*e.g.*, making reasonable accommodations for people with disabilities and instituting policies and practices to resolve discrimination complaints).

Suggested Questions

- Have policies or plans been issued that describe how the special needs of disabled employees will be met?
- What accommodations have been made for applicants or employees with disabilities?
- What are the organization's processes for addressing discrimination complaints?
- Have any complaints been filed within the last three years by individuals claiming discrimination?
- If so, how many complaints were received from individuals identified by race, color, national origin, sex, or disability?
- What were the primary aspects of these complaints?
- How were these complaints resolved?
- Have new processes or procedures been instituted as a result of complaints filed?

Practice 2.4. The Awardee should have mechanisms in place to assess its compliance with nondiscrimination policies.

Suggested Questions

- Has the organization conducted self-evaluations on its compliance with applicable nondiscrimination regulations?
- What were the results of these self-evaluations?
- What actions have been taken to address areas requiring attention as a result of these self-evaluations?

Practice 3.1. The Awardee should have in place, and provide each employee engaged in the performance of the award, a published statement notifying employees of the requirements of the organization's policies and processes regarding a drug-free workplace.

Suggested Questions

- Does the organization have a written procedure outlining their self-certification process?
- Has the organization published a statement notifying employees of the organization's commitment to a drug-free workplace?
- Has each employee to be engaged in the performance of the award been given a copy of the statement?
- Does the statement include the information designated in Exhibit II-3 of the Proposal and Award Policies and Procedures Guide?

Practice 3.2. The Awardee should have processes and practices in place to respond to violations of the drug-free workplace policy.

Suggested Questions

- Has the organization received any notifications from employees on their conviction for violating a criminal drug statute occurring in the workplace?
- Were the notifications received in a timely manner?
- Did the Awardee notify the appropriate Grant Officer or designee of the violation?
- What action was taken with the convicted employee?

Practice 3.3. The Awardee should establish an ongoing drug-free awareness program.

Suggested Questions

- Has the organization established a drug-free awareness program?
- Does the awareness program include all of the components specified in Exhibit II-3 of the PAPPG (*e.g.*, a description of the dangers of drug abuse in the workplace, the Awardee's policy of maintaining a drug-free workplace, any available drug counseling, rehabilitation and employee assistance programs, and the penalties that may be imposed upon employees for violations occurring in the workplace)?

Practice 4.1. The Awardee should have mechanisms in place to identify the type and amount of work as well as the type of workforce required (*e.g.*, numbers and types of positions, workforce competencies, worker experience, educational/professional certifications) to meet the needs to support the large Facility.

Suggested Questions

- How do HR staff members learn about what work is, or will be, required to accomplish the Facility's mission?
- How do HR staff members assess what workforce (*e.g.*, numbers and types of staff) is required to accomplish that work?
- How do HR staff members assess required workforce qualifications (*e.g.*, competencies, experience, educational/professional certifications)?
- How are workforce competencies communicated to staff members?
- What are the biggest areas of misalignment between the work that is required and the workforce available to do the work?
- How are managers addressing these misalignments?

Practice 4.2. The Awardee should have a process in place to identify gaps or surpluses in the workforce that may impede the Facility in accomplishing its mission and take the necessary steps to address the issues.

Suggested Questions

- What demographic or attrition trends could affect the Awardee's ability to attract and retain a skilled workforce that can accomplish the Facility's mission? How are these being addressed?
- What market drivers exist that could affect whether staff and managers choose to join, or remain with, the Awardee? How are these drivers being addressed?

Practice 5.1. The Awardee should provide mechanisms for employees to confidentially express concerns without fear of reprisal.

Suggested Questions

- What recourse does an employee have to voice a workplace complaint?
 - What types of issues are typically raised by employees and how are they typically handled?
 - Do employees have access to external resources to address personal concerns that may affect their productivity on the job?
 - What is the nature of the services available to them?
-

To return to this *module review*, click [Human Resources Review Module](#)

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Procurement Review Questions

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the procurement functions supporting the Facility.

Suggested Questions

- Which staff members manage the procurement functions of the Facility?
- Does the organizational chart reflect the key positions?
- How are lines of authority and responsibility delineated?

Practice 1.2. Roles and duties of staff members responsible for procurement for the Facility should be clearly assigned and defined.

Suggested Questions

- What are the different roles and responsibilities of staff assigned to procurement?
- Is there any evidence that an individual responsible for procurement executed an agreement that exceeded their delegated authority level?
- Are the duties of each key position clearly defined?
- How are staff members made aware of their specific duties and responsibilities?

Practice 1.3. The Awardee should ensure that procurement staff members receive continuing educational opportunities to allow them to successfully support the large Facility.

Suggested Questions

- What continuing educational opportunities are offered to procurement staff members to allow them to perform their required duties?

Practice 2.1. Procurement responsibilities are segregated from the office requesting and accepting the deliverable and from the financial management responsibilities.

Suggested Questions

- Are the functions of procurement and finance offices clearly segregated (via detailed organizational charts or other documents)?
- Are processes for the receipt and acceptance of new acquisitions documented?
- How are invoices processed? Please describe the process.

Practice 2.2. Controls should be in place to ensure that approval thresholds are appropriate and related delegations of authority are not exceeded without authorization.

Suggested Questions

- Do established procedures contain internal controls to ensure that delegations are not exceeded or used without authorization?
- How are program offices advised of the lead times necessary to process and approve procurement requests?
- How are lines of authority and responsibility to approve procurements delineated among procurement and other staff?
- Are the large Facility and procurement staff members aware of these delegations of authority?
- Are system controls in place that limits a procurement requisition approver's authority?
- How does the Awardee ensure that delegations of authority are not exceeded?
- Who is responsible for reconciling the purchase card system? Are there any instances where purchases have exceeded the authority level of the cardholder? How were these reconciled?

Practice 2.3. Written Standards of Conduct should be maintained as required by 2 CFR 215.42 "Codes of Conduct."

Suggested Questions

- Do the standards of conduct meet requirements of 2 CFR 215.42?
- If the standards do not meet Federal requirements, what provisions are missing?
- How does the Awardee ensure that employees do not accept inappropriate gratuities or favors from a vendor or subrecipient?

Practice 3.1. Written policies and procedures should include a provision to avoid the purchase of unnecessary items.

Suggested Questions

- What types of controls are in place to prevent purchase of unnecessary items?

Practice 3.2. Written policies and procedures should require, where appropriate, an analysis of lease and purchase alternatives to determine which would be the most economical and practical procurement for the Federal government.

Suggested Questions

- How is a lease-versus-purchase analysis performed?
- Are lease-versus-purchase analysis documented?
- What process is used for making lease/buy decisions for vehicles? Are GSA motor pool vehicles available for use by the Facility? Are the vehicles available in the GSA excess program reviewed prior to purchase/lease decisions? Are these considerations documented?

Practice 3.3. Written policies and procedures should require standards for solicitations for goods and services.

Suggested Questions

- Does the Awardee review offerors' past performance history?
- What is the process for reviewing offerors' past performance?

Practice 4.1. Cost or price analysis should be performed and the basis for the cost or price should be documented in every file.

Suggested Questions

- What is the process for developing a cost or price analysis?
- How does the cost or price analysis differ depending on the size of the procurement?

Practice 4.2. Procurement policies and procedures pursue competition to the maximum extent practicable, in compliance with 2 CFR 215.43.

Suggested Questions

- How does the dollar threshold influence the competition requirements?
- How are sole source justifications documented? Does the dollar threshold influence the extent of justification required? If so, how?
- Who approved the decision to limit competition? How are justifications for other than full and open competition documented? Who approves the justifications?
- Is the cost comparison to other quotes received relevant and correct? Are discounts considered?

Is a price analysis used to support a best value determination when applicable?

Practice 4.3. The basis for contractor selection should be documented.

Suggested Questions

- Do sample files (for procurements over the small purchase threshold) include documentation related to significant history of the procurement; the rationale for the method of procurement; selection of contract type, contractor selection, or rejection; and the basis of contract price?

Practice 4.4. The Awardee's contracting methods do not allow contract types that are precluded in Federal procurements nor awards to parties that have been excluded from receiving Federal procurements.

Suggested Questions

- Were any potential vendors rejected because they appeared on the excluded parties list?

Practice 5.1. Positive efforts are made to utilize small, minority-owned, disadvantaged, and/or woman-owned businesses whenever possible.

Suggested Questions

- How are procurement personnel encouraged to contract with consortiums of such businesses?
- How do procurement personnel use the services and assistance, as appropriate, of organizations such as Small Business Administration (SBA) and the Department of Commerce's Minority Business Development Agency in

identifying small, minority-owned, disadvantaged, and/or woman-owned businesses?

- Does the Awardee conduct outreach sessions to small businesses to encourage and facilitate participation (e.g., attending trade fairs, conferences, and SBA training)?

Practice 6.1. The Awardees should have a process to evaluate subcontractor performance and document, as appropriate, whether or not the subcontractors met the terms, conditions, and specification of the subcontract.

Suggested Questions

- What internal controls are in place to ensure that contractor performance is regularly assessed?
- Are there different policies and procedures related to vendor performance monitoring depending on the size and complexity of the contract?
- How are those policies and procedures followed?

Practice 7.1. Policies and procedures include the requirement to flowdown the appropriate provisions.

Suggested Questions

- Has the Awardee experienced any breach of terms issues recently? If so, how were the issues handled?

Practice 8.1. Awardee procurements should adhere to the specific cooperative agreement terms and conditions related to procurements and subawards.

Suggested Questions

- How are procurement-related terms and conditions of the NSF award interpreted and incorporated into the Awardee's procurement actions?
- Are the procurement staff members knowledgeable of the requirements of all the specific terms and conditions of the award?
- Does the Awardee flow down all of the required terms and conditions to the subawards?

To return to this *module review*, click [Procurement Review Module](#)

To view the *references* for this module, click [Procurement Review References](#)

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Property and Equipment Review Questions

Practice 1.1. The Awardee should have a clearly defined management structure that has direct responsibility for the property and equipment functions supporting the Facility.

Suggested Questions

- Which staff members manage the property and equipment functions of the Facility?
- Does the organizational chart reflect the key positions?
- How are lines of authority and responsibility delineated?

Practice 1.2. Roles and duties of staff members responsible for property and equipment management for the Facility should be clearly assigned and defined.

Suggested Questions

- What are the different roles and responsibilities of staff assigned to property and equipment management?
- Do individuals responsible for property and equipment have the appropriate level of authority required to accomplish their duties?
- Are the duties of each key position clearly defined?
- How are staff members made aware of their specific duties and responsibilities?
- Are there any situations in the management structure that might lead to a conflict of interest? If so, what are they?

Practice 1.3. The Awardee should ensure that staff members responsible for property and equipment management receive continuing educational opportunities to allow them to successfully support the large Facility.

Suggested Questions

- What continuing educational opportunities are offered to staff members responsible for property and equipment management to allow them to perform their required duties?
- How is the property and equipment staff made aware of NSF expectations and changes to the NSF award?

Practice 1.4. The Awardee should have a delineation of responsibilities for the property and equipment functions to ensure checks and balances.

Suggested Questions

- How does the Awardee ensure adequate segregation of duties?
- Are the property staff members that are in positions of trust adequately bonded?
- How does the Awardee exercise effective control over and accountability for property?

Practice 2.1. Existing policies and procedures should require classification for types of property.

Suggested Questions

- What is the process for classifying property? Is the process consistently applied?
- What are the Awardee classifications for property?
- What is the process for revising the policies and procedures when there is a change with statutory and regulatory requirements?

Practice 2.2. Internal controls should be in place to ensure appropriate acquisition of property.

Suggested Questions

- Is there a central location to receive and tag newly acquired property? Where is the location?
- How is government-owned equipment tagged?

- Is a determination of need for the property performed prior to the acquisition?
- Is a suspense file maintained for property that has been ordered? Who maintains it? Who follows up on it?

Practice 2.3. The Awardee should have adequate documentation for acquisition of Federally funded equipment.

Suggested Questions

- Who is responsible for reviewing proposed purchases of permanent equipment to avoid acquisition of unnecessary items? What is the process?

Practice 3.1. The organization adheres to Federal and organizational policies and procedures to ensure proper use of Federally funded property and equipment.

Suggested Questions

- Under what circumstances might a piece of equipment be used outside the scope of the original acquisition?
- What policies and procedures are in place to require that, in connection with the physical inventory, the Awardee verifies the utilization and assesses the continued need for the equipment?

Practice 3.2. The Awardee should adhere to Federal and organizational policies and procedures to ensure proper disposition of Federally funded property and equipment.

Suggested Questions

- Is the NSF Property Administrator notified when the Awardee plans to dispose of government-owned equipment?
- How does the Awardee comply with the NSF Property Administrator's disposition instructions?
- How are property dispositions documented?
- What are the circumstances when the Awardee declares equipment to be excess and reports it to GSA?
- Are all NSF decals or markings removed from property prior to disposal or transfer? Who is responsible for this?
- How is the condition of excess equipment determined? Is it by personnel familiar with its operation?

Practice 4.1. The Awardee should have policies and procedures in place to ensure that equipment purchased with Federal funds is maintained in good condition. The Awardee also should have a process in place to report lost, damaged, or stolen property to NSF.

Suggested Questions

- What is the Awardee's practice for maintaining equipment in good condition?
- What is the Awardee's process for notifying NSF of lost, damaged, or stolen property?
- Who investigates lost, damaged, or stolen property?
- Has the Awardee incorporated the property management policies and directives of other agencies (*e.g.*, GSA, OMB, Government Accountability Office,

Occupational Safety and Health Administration) into its processes and procedures?

Practice 4.2. Guidance for security and maintenance of property and equipment purchased with Federal funds should be provided to Subawardees.

Suggested Questions

- How does the Awardee assess the Subawardee's policies and procedures for the security and maintenance of property?
- If government-owned property is in the possession of Subawardees, how does the Awardee check for compliance? Is the property reported to the Awardee for inclusion in the GOE report to NSF?

Practice 5.1. The Awardee should have an equipment inventory system that meets the requirements of 2 CFR 215.34.

Suggested Questions

- How often are updates made to the inventory?
- Who authorizes personnel to access the inventory records?
- What issues might delay completion of an inventory review?
- How is off-site or loaned property managed and inventoried?
- Who is a permitted user in the system to enter, modify, or otherwise alter property records?
- How does the Awardee conduct the reconciliation of the physical inventory of equipment and the equipment records? What was the date of the most recent inventory?
- How does the system reflect the individuals who enter or update property records?
- Is there any government-owned equipment acquired by Subawardees? If yes, what are the processes in place to account for the equipment in the Awardee records and how is this equipment reported, to NSF?

Practice 5.2. The Awardee should have clear procedures for reconciling the inventory of equipment purchased with Federal funds.

Suggested Questions

- How often are the inventory records reconciled with the financial records?
- How does the Awardee handle discrepancies?
- Do the property management personnel investigate the reasons for discrepancies?
- Are property records supported by properly certified documents to record receipts, issues, adjustments, and disposal?
- How does the Awardee reconcile the inventory records with the financial records?

Practice 6.1. The Awardee should have developed procedures to monitor compliance with the award terms, conditions, and specifications relevant to property management, and to inform appropriate staff members of these requirements.

Suggested Questions

- Who is responsible for complying with the inventory reporting requirements of the cooperative agreement?
 - Are there any systems in place to ensure compliance with award terms and conditions related to property management?
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To view the *Acronym List*, click [List of Acronyms](#)

APPENDIX C: LIST OF ACRONYMS

AAG	Award and Administration Guide
AMBAP	Award Monitoring and Business Assistance Program
AOR	Authorized Organizational Representative
ARRA	American Recovery and Reinvestment Act
BFA	Office of Budget, Finance, and Award Management
BSR	Business Systems Review
CA	Cooperative Agreement
CAAR	Cost Analysis and Audit Resolution
CASB	Cost Accounting Standard Board
CFO	Chief Financial Officer
CFR	Code of Federal Regulations
COI	Conflict of Interest Policy
DCAA	Defense Contract Audit Agency
DCMA	Defense Contract Management Agency
DDLFP	Deputy Director for Large Facilities Projects
DHHS	Department of Health and Human Services
DIAS	Division of Institution and Award Support
EFT	Electronic Funds Transfer
EEOC	Equal Employment Opportunity Commission
F&A	Facilities and Administrative Cost Rates
EPS	Engineering Performance Standards
FAR	Federal Acquisition Regulation
FASB	Financial Accounting Standards Board
FATC	Financial and Administrative Terms and Conditions
FCTR	Federal Cash Transactions Report
FFR	Federal Financial Report
FFRDC	Federally Funded Research and Development Centers
GAO	Government Accountability Office
GPRA	Government Performance and Results Act
GSA	General Services Administration
HR	Human Resources
IDC	Indirect Costs
IT	Information Technology
LDD	Lost, Damaged, and Destroyed Property
LFO	Large Facilities Office
MREFC	Major Research Equipment and Facilities Construction
NSF	National Science Foundation
ODI	Office of Diversity and Inclusion
OIG	Office of Inspector General
OMB	Office of Management and Budget
ONR	Office of Naval Research
PAPPG	Proposal and Award Policies and Procedures Guide
PI	Principal Investigator
POC	Point of Contact
R&RA	Research and Related Activities
SBA	Small Business Administration
SEFA	Schedule of Expenditures of Federal Awards
SPO	Scientific Program Order