INTERNATIONAL PROJECT MANUAL

The Mailman School of Public Health at Columbia University is one of the United States' largest and most respected graduate schools of public health. Its faculty and students undertake research, education, and service initiatives in areas as diverse as globalization of emerging infections, health care policy, cancer, reproductive health, violence, environmental health, asthma, clean water, disaster preparedness, HIV/AIDS, and biostatistics.

While headquartered in New York City, the Mailman School increasingly carries out programs and projects in international sites, primarily in resource-poor countries. These range from one-person part-time research operations to multi-million dollar programs implemented by country offices. They are funded by various donor agencies, among which U.S. government agencies and private foundations are most prominent.

This International Projects Manual applies to the majority of Mailman School's international activities, most of which are small in scale. When warranted by the greater size and complexity of an international operation, the manual refers the reader to the standard operating procedures (SOPs) of the Mailman School's ICAP.

Introduction

The purpose of this manual is to guide Mailman School Department Administrators, project officers, and principal investigators (PIs) in establishing and implementing international programs and projects.

It provides policies and procedures for operating an international project, with an emphasis on:

- complying with Columbia University policy,

- auditors' standards, and

- the relevant rules and regulations of the University's funding agencies, especially the U.S. government (USG).

It assumes that most international projects are implemented in resource-poor countries.

Those engaged in international projects are urged to use this manual to cause or create an atmosphere of compliance and risk management. Given the wide range of operating contexts in resource-poor countries, the manual cannot respond to all risk scenarios that may arise. For example, the guidance for human resources management may be weak or irrelevant in the context of a complex humanitarian crisis.

If the project leadership determines that risks are jeopardizing compliance or inhibiting effective project implementation, the PI should initiate consultations with other Mailman School or University departments and seek a determination on supplemental or replacement risk governance to meet the project's needs.

Note that this manual is not a program handbook. It does not cover how to design and implement research and public health programs.

Manual Overview

The manual provides guidance for a wide range of operational activities in the field. Following this section with introductory material, there are nine additional sections, as follows:

- Codes of Conduct lays out the expectations for behavior by all those engaged in international projects. It also covers compliance filings for research and lays out the procedures for certification of compliance with Columbia University's conflict of interest policy, which is required of employees when first hired and on an annual basis thereafter.

- Developing International Projects describes the various funding instruments Mailman School uses and the policies and processes for proposal and budget development. It lays out the requirements for institutional review and approval of new projects, with special attention to the risk-management procedures the University has established.

- Operations/Establishment of International Projects should be used by anyone engaged in initiating an operation in a new country or region of a country. It presents procedures for renting office space and setting up administrative systems. It covers legal issues associated with operating outside the United States, such as in-country registration and memoranda of understanding with foreign governments. It lists important points to keep in mind when dealing with technology and with communications and publicity.

- Grants and Contracts conveys the expectations for proper management of awards, from application for funds through amendment and close-out of agreements and contracts. It describes the responsibilities of the PI in complying with the rules and regulations of funding agencies.

- Financial Management summarizes important policies and procedures for financial management and expense reporting, as well as cash management (including international bank accounts), procurement, and property management. It also covers financial reporting to funding agencies.

- Travel covers topics such as the applicable USG regulations, travel advances, per diem, and expense reporting. It also touches on vehicle usage.

- Human Resources Management summarizes important procedures for recruitment, hiring, compensation and benefits, orientation and staff development, performance management, and employment separation. It explains requirements for Local Hire Manuals and for retention of human resources records and includes a short section with guidelines for contracting both local and international consultants.

- Subaward Management highlights the most important aspects that PIs and Country/Project Directors must keep in mind when Mailman School awards funds to subrecipient organizations. It covers the steps from initiation of a subaward through the close-out process, with emphasis on monitoring for compliance with USG regulations and grant/contract conditions.

- Close-Out specifies how to prepare for closing an operation and what is required by funding agencies and the University.

Other Guiding Documents

This manual highlights the most important operational guidelines for implementing international projects. Some international projects will have their own administrative manuals, which may provide more specificity on certain topics, such as procedures for professional development, budgeting constraints, the project's file-naming convention for documents, and the organizational structure of the project.

Additional guidance may be found in the ICAP SOPs, as describedpreviously, and in Columbia University policies and procedures, and funding agency policies, procedures, and regulations, as described below.

Columbia University Policies and Procedures

Throughout this manual there are references to Columbia University policies and procedures relevant to international projects. PIs and others with management responsibilities can also find helpful resources through the Global Support website, which is a University resource dedicated to better assist departments with projects outside the U.S. and includes references to important legal and regulatory issues that should be addressed to ensure compliance with both University and governmental agencies. Additionally, PIs and others should be familiar with the existence of the Columbia University Administrative Policy Library, which is frequently referenced in this manual.

Regulations of Funding Agencies

Most funding for international projects is governed by some form of grant agreement, cooperative agreement, or contract in which certain terms and conditions of the award are stipulated. In addition, the National Institutes of Health (NIH), Centers for Disease Control and Prevention (CDC), and other U.S. government agencies have extensive regulations to which recipients of USG funds must adhere. These are available in the award documents and on the agencies' websites.

Ruling Authority

Rights of Mailman School

Columbia University and Mailman School management retain the right to modify, alter, or delete policies. No advance notice to employees shall be necessary. However, in the absence of a specific written policy or procedure, the PI in collaboration with the Dean's Office will determine the proper course of action, and additions, if necessary, will be inserted in this manual.

The policies in this manual have been written taking into account the ruling authorities and the University's agreements with its donors. In the event of a contradiction between this manual and other Columbia University documents or funding agency documents, the Mailman School Vice Dean for Finance and Administration will either render a decision or involve appropriate parties to render that decision.

Management Authority and Reporting

Principal investigators have management authority over the technical, financial, and administrative activities of each grant and contract. They are required to exercise oversight of their international projects and are responsible for adhering to the terms and conditions of the awards.

Although the PI may delegate responsibility for day-to-day management of a grant or contract to others within the department or unit and/or to a Country/Project Director, the PI must exercise appropriate oversight to ensure that all University and funding agency requirements are met.

The PI and Country/Project Director, where applicable, have similar responsibilities for subawards, where the international project supports and implements specific activities through subgrants or subcontracts. See Subaward Management for details.

Future Changes to This Manual

The guidelines presented in this manual are subject to change and interpretation at the discretion of funding agencies and by Mailman School leadership. These changes and formal interpretations may be issued at any time and will be found as revisions or additions to the master copy, which resides on Mailman School website under "Administrative Resources".

Codes of Conduct

NY-Hired Personnel

All Columbia University policies apply to University NY-hired personnel working on international projects, whether the employee is based in the United States or is based in another country as an "expatriate." Exceptions may occur when a University policy is specifically intended to apply to employees working in New York or when a University policy is in conflict with the laws of the country in which the international project is operating. Columbia University policies may be found in the online Administrative Policy Library.

Local Hire Staff

The following standard codes of conduct should be modified as required to be in compliance with the laws in the operating context of the international project and then applied to all staff hired locally in field sites. The codes of conduct must be readily available to all staff and should be translated into local languages as necessary to meet this requirement. New employees should always be provided with an orientation to the codes of conduct. (See requirements on having a Local Hire Manual.)

Large Field Operations

International projects with a large operational presence in foreign countries will need additional codes of conduct on topics such as nepotism, dress code, and workplace violence. These may be drawn from the ICAP SOPs and adapted to the particular context.

In the Case of Contradiction

Those operating in a foreign country may find distinctions or contradictions between the codes of conduct specified by Columbia University and those specified by local law. The guiding principle in all University operations is that the higher standard of conduct is the one that rules. If interpretation is needed in such cases, the principal investigator should consult the Mailman School Dean's Office, the University's Office of the General Counsel, or other departments as relevant and then render a decision.

Conflict of Interest

The University holds a fundamental concern for ensuring that the integrity of the institution and of all of its constituent members remains above reproach. Not only actual conflicts of interest, but also the appearance of conflicts, are harmful to both the University and the individual involved.

The University has several conflict of interest policies with which faculty members, other officers, and staff members are expected to comply. The policies, which are available in the appendices of the Faculty Handbook, are:

- Statement of University Policy on Conflicts of Interest (1987)
- Guidelines for Situations Involving Potential Conflicts of Interest Between Scholarly and Commercial Activities (1986)
- Columbia University Medical Center Conflict of Interest Policy (1994)

Additional policies cover general conflicts, conflicts of commitment, and other related topics. See the University's Office of Research Administration's list of policies relevant to implementation of grants and contracts.

Annual Certification of Compliance

All NY hires must obtain certification of compliance with Columbia University's conflict of interest policy when first hired and on an annual basis thereafter. Certification is obtained by completing the conflict of interest form in RASCAL, which is the University's online Research Compliance and Administration System. Each year on the anniversary of an employee's hire date, he/she will receive a reminder to file the form. For step-by-step instructions, see Appendix 2: Filing a Conflict of Interest Disclosure Statement of the ICAP SOPs.

Researchers must also fill out a conflict of interest form for each protocol that has human

subjects. For further information, see the University's Conflict of Interest and Research site.

Conflict of interest certifications must be current for all officers and faculty on a project in order for the University to permit any proposal to be submitted to a funding agency or to include such person's salary support on any funding proposal.

Administrative

Columbia University has an Administrative Code of Conduct to promote the environment of respect that is central to success of the University and the individuals who work for it.The policy articulates the principles that govern interactions at the University and some of the basic expectations that flow from those principles. Specifically, the following topics are covered: respect for governance, respect for others, respect for information, respect for property, and ethical conduct.

- **Respect for governance** covers the expectation that members of the Columbia University community will act in compliance with the laws, regulations, and policies that are in effect and that govern behavior, the conduct of University business, and the use of University information systems.

- **Respect for others** governs interactions between people within the Columbia University community and between those within and outside the University community.

- **Respect for information** covers the proper handling of information and maintenance of confidentiality.

- **Respect for property** calls for maintaining the highest standards of stewardship for the property and resources entrusted to the University.

- **The statement of ethical conduct** lays out the basic principles of ethical conduct and procedures for acting if a person is concerned with another's conduct.

Human Resources Policies

The following human resources policies established by the University may need adaptation to the variety of cultural, social, and legal contexts within which the international project is operating. Such adaptation should be made judiciously and in consultation with local legal counsel.

Further specification in the policies may also be required, e.g., a listing of which substances are banned in the University's substance-free workplace. The details should be documented in the Local Hire Manual, where one exists (see Local Hire Manual), or as a management memo for employees and consultants working on the project.

Substance-Free Workplace

Columbia University operates a substance-free workplace in all locales. Smoking is prohibited in all University-owned, leased, or controlled facilities and vehicles, regardless of local custom. This includes all offices, laboratories, and storage rooms. Employees who smoke must do so outside of University facilities.

Alcohol and other banned substances may not be consumed during work hours. No employee may work under their influence on University premises or while operating a University vehicle, no matter where the substances are consumed. An employee found to be under the influence of alcohol or drugs during working hours is subject to immediate termination of employment.

The use, manufacture, sale, or distribution of illegal drugs is strictly forbidden and grounds for immediate dismissal. Employees should not operate a University vehicle while under the influence of any legal drug that may cause drowsiness or other side effects that may be dangerous under certain circumstances.

For further information, see the policies on Smoking and on Drugs and Alcohol.

Equal Opportunity

Columbia University is an equal opportunity employer. It does not discriminate against employees or applicants for employment on the basis of race, color, sex, gender, religion, creed, national and ethnic origin, age, citizenship, status as a perceived or actual victim of domestic violence, disability, marital status, sexual orientation, status as a veteran, or any other legally protected status.

Columbia University recognizes that certain countries may have additional anti-discrimination laws apart from or beyond the above policy. The guiding principle in all international projects of the University is that the higher standard of anti-discrimination is the one that rules.

For the full text, see the Equal Employment Opportunity and Nondiscrimination Policies.

Discrimination and Sexual Harassment

Columbia University is committed to providing a working and learning environment free from discrimination and sexual harassment and to fostering a nurturing and vibrant community founded upon the fundamental dignity and worth of all of its members. Consistent with this commitment and with applicable national and state laws, it is the University's policy not to tolerate discrimination and sexual harassment in any form and to provide those who feel that they are victims of either with mechanisms for seeking redress.

This means that employees have the right to the enjoyment of a workplace that is free from harassment by word of mouth or conduct resulting in fear, pressure, or discomfort caused by any other fellow employee. Employees who engage in any form of harassment of other employees shall be in breach of this agreement and shall be liable to disciplinary action or immediate dismissal.

Under the University's policy, all employees are protected from coercion, intimidation, interference, or retaliation for filing a complaint or assisting in an investigation under any of the applicable policies and laws. If an international project hires staff locally, the principal investigator is obliged to inform each new employee of these policies and any applicable local laws, and to provide specific information on to whom a complaint or concern may be addressed.

Further information on this topic may be found in Columbia University Equal Employment Opportunity and Nondiscrimination Policies and Procedures on Discrimination, Discriminatory Harassment and Sexual Harassment.

Compliance Filings for Research

Columbia University requires all of its NY-hired and locally hired employees and consultants to be in compliance with laws and University and funding-agency policies regarding research with human subjects.

To ensure compliance in the research conducted, Columbia University requires that University personnel and programs use RASCAL, Columbia University's online Research Administration System, to process compliance for:

- Health Insurance Portability and Accountability Act (HIPAA) and Good Clinical Practices Training Certifications
- Human Subjects (Institutional Review Board - IRB)

For all research, including public health evaluations and special projects, University personnel are typically required to follow these steps:

1. Develop the protocols for the research
2. Develop the proposal and budgets as required
3. Enter the required information in the RASCAL Proposal Tracking Module

4. Have the proposal reviewed and approved by Research Administration

5. Submit the funding application

6. If notified of the possibility of obtaining funding, enter the required information in the RASCAL IRB Module, attaching necessary documents

7. Submit the protocols for review by Columbia University's Institutional Review Board (IRB) for either a non-human-subjects research determination or for review and approval as human-subjects research

8. Once IRB approval is received, transmit evidence of approval to the funding agency and, if required, submit a copy of the research protocols

9. Obtain funding agency approval

10. Maintain complete records for the compliance filing

For further information, see:

• Developing International Projects, which provides information on proposal and budget development, institutional review and approval, risk management procedures, and other compliance topics

• The University's Sponsored Project Handbook covers many related topics and has a section on "Special Approvals" that is particularly of interest for compliance filings for research

• The University's Research Compliance and Training site

Developing International Projects

Principal Investigator Eligibility

The Principal Investigator (the individual submitting the application) on a research, training, or service proposal must be a Columbia University officer of instruction with a fulltime appointment and have the rank of instructor or higher.

• Fulltime officers of research with the rank of senior research scientist/scholar or research scientist/scholar are also entitled to serve as PIs and no special approval is required.

• Fulltime officers of research with the rank of associate research scientist/scholar and postdoctoral research scientists/scholar may serve if approved by the Executive Vice President for Health and Biomedical Sciences.

The applicable rank is that which will be in effect at the time the application is awarded. The principal investigator of a project assumes full administrative, fiscal, and scientific responsibility for the conduct of the project.

In certain cases, individuals who are not fulltime officers of instruction or research may serve as Principal Investigators. To obtain an exception, an officer should obtain authorization of both the department chair or center director and the Executive Vice President for Health and Biomedical Sciences, then forward the request to the University's Office to Research Administration (RA).

The request must include an abstract of the proposed project as well as the individual's curriculum vitae. The RA Project Officer reviews the request and seeks the final authorization from the Senior Vice Dean of the College of Physicians and Surgeons.

Additional information concerning eligibility to serve as a principal investigator can be found on the Columbia University Medical Center site.

External Funding

Funding Mechanisms

Columbia University's international projects are funded by entities that use several funding mechanisms or instruments.

• Grants: A grant supports an activity in which the investigator and the University are the primary beneficiaries. The granting agency plays no active role managing or directing the project, and the investigator and institution have considerable discretionary powers with respect to both scientific direction and budgetary flexibility. This funding mechanism is the one most commonly used by agencies that fund biomedical research.

- Cooperative Agreements: The U.S. government (USG) sometimes awards funding in the form of a cooperative agreement, which is similar to a grant except that the degree of involvement by the awarding agency is greater. It is frequently used for government-sponsored, multi-center, clinical trials or for research areas where the government has funded multiple grants that require cooperative effort either to achieve programmatic goals or to avoid duplication. Administrative rules governing cooperative agreements are similar to those governing grants. However, program officials monitor progress more closely; can strongly suggest research direction; mandate interinstitutional cooperation; and/or adjust funding depending upon progress or programmatic needs. Currently, only the U.S. government uses this funding mechanism.

- Contracts: A contract is a legal document that specifies a task (or tasks) to be performed in conformance with the requirements set forth by the contractor or awarding agency. The investigator or contractee is required by law to fulfill the terms of the contract and is afforded no flexibility. Changes in scope, direction, or budget require the written approval of the contractor. (For USG agencies, approval is obtained from the Contracting Officer. This individual is usually different from the Project Officer who oversees the scientific conduct of the work.) The majority of contracts given to Columbia University Medical Center are for research and are "cost reimbursement" contracts. In this type of contract, the University and investigator are required to put forth their best efforts to meet the terms of the agreement. However, they are not required to complete the work if costs exceed the contracted amount. In a "fixed price" contract, the project must be completed even if part of the costs must be assumed by the investigator and the University.

- Fee-for-Service Contracts: A fee-for-service contract is an agreement that is similar to a service grant in that it is awarded to perform work in which there is limited intellectual or programmatic involvement. Examples are performing laboratory tests or hiring a firm to conduct interviews. A good rule of thumb in deciding if an agreement is a fee-for-service or research (sub)contract is to consider whether the individual performing the work would be named as an author on a paper resulting from the research.

- Subgrants and Subcontracts: A subgrant or subcontract is an award received by the University through a lead organization that has received an award from a funding agency. Known collectively as subawards, they describe the relationship that exists between the primary contractee or grantee and a secondary investigator and institution on a project. A subaward is used when substantive programmatic work and intellectual input will be provided by a secondary or cooperating institution. The structure of a subaward is similar to that of an award in the form of a grant or contract, except that the relationship is between the primary and secondary institutions and not between the primary institution and the awarding agency. In general, any restrictions or conditions applicable to the primary institution are "passed along" via the subgrant or subcontract to the secondary institution. Additional restrictions or conditions can also be imposed.

In this manual, the generic term "grants and contracts" refers to all the above types of funding mechanisms. In addition, the generic term "funding agencies" is used for all entities that fund or sponsor projects.

For information on subgrants and subcontracts that the University awards to a secondary investigator or institution, see Subaward Management.

Types of Application

Applications for grants and contracts can differ depending upon whether they are proposals for new funding, competing continuations of awards (or renewals), or non-competitive proposals. In all cases, specific University approvals are required prior to submission of an application for funding (see Institutional Review and Approval for new submissions and Award Amendments for amendments).

Proposal and Budget

Pursuit of Funding and University Restrictions

A principal investigator may become aware of international possibilities for new funding or increased funding under an existing funding instrument. The Department Chair or Center Director must be informed immediately of any possibility that the PI may want to pursue this new or additional funding. The PI may then proceed with discussions with representatives of funding agencies, but

is not authorized to submit a concept paper, budget, or proposal to a funding agency, and may not formally request additional funds under an existing funding instrument.

The decision to pursue funding resides with the Department Chair or Center Director. All funding applications must be reviewed and approved by Columbia University's Office of Research Administration with approval of the Department Chair or Center Director. In addition, all new large grants must be approved by the Mailman School Dean's Office.

Promises or commitments from funding agency representatives do not suffice as a commitment of funds for new or existing international projects. Project staff must wait until the PI communicates that an official Notice of Award has been received by Columbia University. See Special Considerations for details.

Risk Management Review

Proposed new international projects should be assessed to determine if they meet the criteria that require the application of the University's policy on International Research and Service Projects: Risk Management Procedures. The procedures entail an initial review of large, complex, or high-risk international projects in the grant/contract application stage. See Risk Management for details.

Guidelines and Resources for Preparing an Application

The most important resource for preparing an application is the University's Sponsored Project Handbook. Institutional information that is required for inclusion in many proposals – including the University's legal name, taxpayer identification number, and indirect cost rates – is available through another link at that same site.

Additionally, the Funding Planning and Budget section of the Columbia's Global Support site, includes resources that could be helpful when developing a budget for an international operation.

Engagement with Others in the Department or Center

The PI is responsible for engaging others in his/her department or center during the proposal development process. At a minimum, he/she should:

- Consult with the Department Chair or Center Director about the application for funding
- Work closely with the Department Administrator on all three pieces: the budget, the budget justification, and the narrative in which the operational modality will be described (see Operations for details)

One role of the Department Administrator is to ensure that budgets for programs with more than one grant/contract are consistent with each other. This is especially important when a staff position is charged to more than one grant/contract: special attention must be given to the correct distribution of salary and fringe benefits to the funding sources.

If the funding application proposes establishing ongoing operations in a new locale, the PI should write to the Mailman School Finance Office to request that the Mailman School Dean's Office initiate contact with the Office of the General Counsel and the Treasurer's Office.

Early Engagement with the Office of Research Administration

Early contact with the Office of Research Administration is required for several purposes:

- To inform RA about the plan to submit a funding proposal
- To verify with the RA Project Officer the correct fringe benefits rate, travel per diems, indirect costs rate(s) or administrative fee, and any other applicable rates that must be included in the budget (see below for more on indirect cost rates)
- To advise the RA Project Officer if the project will involve any of the following elements, for which University approvals may be needed prior to or soon after the submission of the proposal:
    - o   Use of human subjects or informants
    - o   Use of vertebrate animals
    - o   Use of recombinant DNA or hazardous materials
    - o   Use of the University's mainframe computer

- o   Use of University space and/or special facilities
- o   Subawards

These and additional required approvals are covered in the University's Sponsored Project Handbook, the link for which may be found at http://www.columbia.edu/cu/researchadministration/. Note that projects meeting the risk-management criteria must be reviewed, as per the procedures in Institutional Review and Approval.

Research Administration requires PIs to submit all applications for funding in full, final form at least 5 business days prior to the submission deadline to allow for adequate internal review of the application. Well in advance of the deadline, PIs should send to Research Administration a draft of the project description with a copy of or the link to the solicitation for applications, if applicable. This provides the RA Project Officer with an opportunity to confirm that application instructions are followed (e.g., length, font size, and required information).

Note that Research Administration can help with proposal development by:

- Providing information via the InfoEd system on whether Columbia University has ever received an award from this agency, who received it, and the size of the proposed and awarded budgets
- Providing helpful comments on the budget, budget justification, and other issues pertinent to providing the general information required in the application

Use of InfoEd for Electronic Proposal Development

InfoEd is the University's grants/contracts management software. It allows tracking of grant/contract information throughout the lifespan of an award, including the pre-award and post-award phases. It generates account numbers and reports.

InfoEd's importance to development of international projects is that it allows for and includes an electronic proposal development system. Its modules include:

- Proposal development
- Proposal tracking
- Account set-up
- Information on grant/contract and networking opportunities

For proposals to the National Institutes of Health (NIH) requiring electronic submission to grants.gov and in the future for all funding applications, PIs must use the electronic proposal development system in InfoEd.

Indirect Cost Rates

All Columbia University applications for funding must include indirect costs. The PI should work with the Department Administrator and Research Administration to ensure the indirect cost rates and the associated calculations in the initial or renewal application are handled correctly. He/she should be aware of the following:

- Indirect costs are charged to grants and contracts as percentage rates that are known as Facilities and Administrative (F&A) cost rates and Fringe Benefit rates. The indirect cost rates for USG funding are negotiated periodically between Columbia University and the U.S. government and are documented in a formal agreement. These rates must be applied to all grants and contracts that the U.S. government awards to Columbia University. To find the F&A and fringe rates that should be used in a funding application, visit the University's Sponsored Projects Administration site.
- All applications to USG funding agencies must include Columbia University's official, negotiated indirect cost rates. Funding applications to non-USG entities must also include indirect cost rates. In those cases, the usual procedure is to use the NICRA rates.
- If a non-USG entity will only fund an indirect cost rate below the established NICRA rate, prior written approval is required from the department chair or center director, the Mailman School Associate Dean for Finance, and the Mailman School Vice Dean for Finance and Administration.
- The funds in the indirect costs line item on the approved project budget may not be spent by the international project. The University retains these funds in their entirety.

If project staff or in-country funding agency representatives have questions about indirect costs, these should be addressed to the Department Administrator.

Limits on What May Be Included in Budgets

OMB Circular A-21, Cost Principles for Educational Institutions, contains specific language which precludes or limits budgeting and charging certain expenses to USG grants and contracts. These expenses include specifically unallowable costs, clerical and administrative salaries, and office supplies. For further details, see the University's Sponsored Project Handbook found on the Sponsored Projects Administration site.

Cost Sharing or Match

All of the resources necessary to carry out a project funded by a governmental agency, private foundation, or industrial or other funding agency should normally be budgeted on and ultimately charged to that project. There are occasions, however, when some of the costs of carrying out a project are to be funded from other sources, whether required by the funding agency as a condition of the award (Mandatory Cost Sharing), not required by the funding agency but nevertheless promised by the Principal Investigator to the agency (Voluntary Committed Cost Sharing), or not required by the funding agency and not promised by the Principal Investigator, but nevertheless charged to a funding source other than that of the project (Voluntary Uncommitted Cost Sharing).

For details on University policy, see the Columbia University Policy on Cost Sharing. Important points to keep in mind are:

- The funding source of Mandatory Cost Sharing and Voluntary Committed Cost Sharing must be identified and approved by the person with authority over those funds at the time the commitment is made to the funding agency. Further, those costs must be readily identifiable in the University's financial records to auditors and others in order to document that those cost-sharing commitments have been met and are properly accounted for. Voluntary Uncommitted Cost Sharing does not have to be identified, nor does it have to be accounted for.

- USG regulations require that funds from non-USG awards be utilized as the source of cost sharing for USG-funded awards.

- In general, funding proposals should include only the minimum amount of cost sharing necessary to meet funding agency's requirements, and Voluntary Committed Cost Sharing is strongly discouraged.

Subawards

If contemplating passing funds to international or local agencies as part of project implementation, these actions will likely require formal subawards and should be noted as such in the application for funding. Subawards are subagreements and subcontracts that Columbia University gives to other entities (subrecipients) to facilitate performance of and payment for specific work to be conducted by the subrecipients.

The funding proposal should include all contemplated subawards; this is especially important for USG funding applications as part of the process for obtaining prior funding-agency approval for all subawards. Also, in the project design and its associated budget, the proposal should take into account that the University is responsible for monitoring subrecipients for compliance with all funding agency regulations and grant/contract conditions. See Subaward Mangement for guidance.

Risk Management

Columbia University has a policy entitled International Research and Service Projects: Risk Management Procedures in recognition that some projects involve special risks. The risk management procedures provide a mechanism for the University to inquire as to what risks should be considered and how they should be managed.

The procedures specify that there will be:

- Early identification of large, complex, or high-risk international projects
- Initial review of such projects, in the grant/contract application stage, to spot major issues (the review should not delay the submission of a grant/contract application)
- A more comprehensive review when it is certain that a project will be funded
- Ongoing, regular monitoring of certain projects

The following summarizes key procedures. PIs should be familiar with the entire policy found on the University's Research Compliance & Training website.

Criteria

Generally, only those projects that meet one or more of the following criteria will be reviewed:

1. The direct costs of the project exceed $1 million per year, of which at least 50% will be expended outside the United States (either directly or through one or more subawards).

2. The project involves ongoing University operations in a non-U.S. country, such as the establishment of an office, leasing of space, or an on-the-ground presence for more than a nominal period.

3. The project is located in, is funded by, or involves a collaboration with persons in a country on the Treasury Department's Office of Foreign Assets Controls (OFAC) list of embargoed countries at http://www.treas.gov/offices/enforcement/ofac/programs.

4. The project involves the use of high risk materials (e.g., radioactive materials or certain biologic materials).

Notification to Research Administration

The risk management procedures for the notification stage are as follows:

- The PI or Department Administrator notifies the appropriate RA Project Officer of his/her intent to submit the funding application, providing maximum time for pre-application review of the project proposal.

- The RA Project Officer asks the PI or Department Administrator the questions set forth in the Criteria Form.

- If a proposal is entered into RASCAL or InfoEd, the system asks whether the proposal involves international research or service. If it does, and the RA Project Officer has not already done so, he/she will call the PI or Department Administrator and ask the questions set forth in the Criteria Form.

- If an RA Project Officer, upon review of any proposal, ascertains that the project involves international research, he/she calls the PI or Departmental Administrator and, if not already done, asks the questions set forth in the Criteria Form.

- If the project is to be funded by a gift, the initial notification to Research Administration is coordinated through the Office of University Development and Alumni Relations.

International Research Questionnaire

If the project meets the above criteria, the PI should notify Research Administration as early as possible of the intention to apply for funds for the project. The RA Project Officer will ask the PI or Department Administrator to complete the questions set forth in the International Research Questionnaire found at http://www.cumc.columbia.edu/research/website/3/5/21/.

The Associate Vice President for Research Administration and the Director of the Office of Research Compliance and Training (ORCT) will determine on the basis of the International Research Questionnaire whether the questionnaire should be reviewed by the International Research (IR) Committee. If not, the Project Officer will notify the PI or Department Administrator. If so, the Project Officer will forward the International Research Questionnaire to the IR Committee and so notify the PI or Department Administrator. After its review of the proposal, the IR Committee will either notify the PI or Department Administrator that no further review is needed or work with the PI to resolve any questions.

If any issue needs further discussion, the proposal will be referred to the appropriate senior administrator for review. All issues will be addressed and resolved with the PI as expeditiously as possible.

Post-Award Steps

After a proposal is funded, the project will be reviewed for financial, legal, and operational risks by the IR Committee or an ad hoc committee appointed by the Chair of the IR Committee.

If appropriate, the Finance Division will work with the PI and the Mailman School Associate Dean for Finance to establish a set of financial controls and an ongoing monitoring plan for the project, and the appropriate structure for the project and a plan for mitigation of legal risks, as needed.

Institutional Review and Approval

In addition to the review of high-risk international projects, all funding applications must be reviewed and approved by the Office of Research Administration with approval of the Department Chair or Center Director. The procedure is as follows:

1. Proposals to the National Institutes of Health (NIH) requiring electronic submission through grants.gov – and in the future all funding applications – must be written in InfoEd.

2. Research Administration requires submission of the final version of the proposal at least 5 business days in advance of the agency deadline – with no exceptions. If any special approvals are required (see Proposal and Budget), additional processing time may be necessary, especially if the funding agency requires such approvals at the proposal stage.

   Note: The deadline used by electronic systems such as NIH's eRA Commons or grants.gov is the actual moment the agency's computer receives and logs the proposal as received. Adequate time for transmission and Internet traffic means that Research Administration must have the final application for submission five business days prior to the sponsor's due date. Even if an agency states a deadline outside of normal business hours (e.g., 8 p.m. or 12 midnight), the PI must plan to submit a proposal within normal Columbia University business hours, between 9 a.m. and 5 p.m.

3. When submitting a proposal to Research Administration, the PI includes any special program announcements or agency guidelines that one must follow in proposal preparation. This enables the RA Project Officer to review and advise the PI of any necessary changes and also any special handling requirements.

4. Research Administration reviews the proposal to ensure compliance with agency and University policies and guidelines and upon completion, contacts the PI to advise him/her of any errors or omissions in the proposal.

5. The PI and Research Administration work together to finalize the proposal.

6. The electronic approvals of the Principal Investigator, Department Chair or Center Director, and the appropriate authorized University individual (usually the RA Project Officer) are obtained. The proposal is signed on behalf of the University by a Director or Associate Director, who may, if required, countersign a covering letter certifying the University's approval of the project.

7. Once all required approvals are on file, Research Administration formally submits the proposal, if it is for any governmental entity or one of several non-governmental agencies. If for another funding agency, a hard-copy signed proposal is returned to the department for mailing. For non-electronic submission only:

8. Proposals should not be bound in any fashion. Indeed, some agencies request that proposals be submitted unbound and in most cases photocopied on single-sided sheets. Most agencies prefer that proposals be fastened with staples only. If intending to submit proposals in binders, the PI should first contact the funding agency to ensure that this is permissible.

9. The RA Project Officer keeps two full copies of the final application submission, while the PI and Department Administrator should each keep one full copy on file, bearing in mind the need to maintain the confidentiality of salary information.

Special Considerations

Annual Certification of Compliance

Conflict-of-interest certifications must be current for all officers and faculty on a project in order for the University to permit any proposal to be submitted to a funding agency or to include such person's salary support on any funding proposal. See Annual Certification of Compliancefor details.

Research Compliance

Funding applications must reflect Columbia University's requirement that all personnel be in compliance with laws and policies regarding research with human subjects. See Compliance Filings for Research for further information on compliance filings for research.

Copyrights and Patents

Funding applications must comply with University stipulations

1. not to infringe the copyright and patent interests of others and
2. to preserve the University's own copyright and patent interests.

Consultant agreements should specify that Columbia University owns the copyright in materials the consultant may produce. It is also wise to specify to employees and consultants how data collected for a University international project may or may not be used. For further information, see Columbia University's Copyright Policy. If the international project may have CDC funding, see also CDC's policies on data sharing.

Awarding of Funds

Funding Agencies' Questions and Negotiations

The funding agency typically reviews applications for both technical and financial merit and, on occasion, will have questions about the University's submissions. Preparation of responses is the PI's responsibility. **The PI must obtain RA review and approval of the responses prior to submission to the funding agency**.

Note that any correspondence with the funding agency at this time – as well as throughout the duration of the award – must be retained according to the record retention policies of the University and the funding agency. See Record Keeping and Retention for further information.

Notice of Award

If the funding agency decides to give an award to Columbia University, the PI receives an official Notice of Award directly or via Research Administration. The PI should ensure that the Department Administrator and Research Administration have copies of all notices.

Operations

Operational Modalities

When establishing a new international project, the principal investigator (PI) may choose among several operational modalities in foreign countries, depending on the nature and scale of the project:

- **Short-term visits** by University personnel or consultants, providing technical assistance, or otherwise working with local partner organizations, requiring no University bank accounts, leased office premises, or locally hired staff.
- **Small-scale, ongoing field operations** involving locally financed activities, where the project may require local-hire staff or consultants, University bank accounts, and/or a field office (i.e., leased office premises).
- **Major, ongoing field operations,** typically over several years and requiring local registration, bank accounts, locally hired staff, and a field office – perhaps even a Country Office with a main office and satellite offices.

The modality of short-term visits likely will not require using the services of local legal counsel, obtaining country registrations and tax-exempt agreements, and establishing an office. However, modalities with ongoing operations may require these elements, as described in other parts of the Operations section. Those establishing international projects with the short-term-visits modality should skip to Other Legal Matters.

Approvals

Approval to Establish Ongoing Operations

The PI is responsible for seeking approval to establish ongoing operations in a new locale. He/she should write to the Mailman School Finance Office to request that the Mailman School Dean's Office initiate contact with the University's Office of the General Counsel (OGC), responsible for approving new country registration, and the Treasurer's Office, responsible for approving new international bank accounts.

The communication should be accompanied by an executive summary to include the funding agency's request to work in the specific country, activities to be undertaken, and the proposed budget.

The decision for an international project to establish a field office – whether small with one office or large with several office locations – should be made only once the University has received a notification of award for an international project in a given country. If another international project of the University is already established in that country, the Dean's Office will work with the relevant PIs and the Office of the General Counsel to determine whether or not to establish a separate, distinct operation for the new project.

The PI should begin country operations by assigning (or hiring) in New York a professional to oversee the start-up procedures. At the same time, if the field operation will be large, the PI should recruit and appoint a person to lead and direct the field office, e.g., as Country Director or Project Director. In such cases, the PI will delegate to the field director significant authorities required to carry out his/her job.

While concurrence from the funding agency (e.g., CDC or USAID) is not necessarily required for the establishment of a field office, plans for such an office should always be made in close communication with their local representatives, who may be able to facilitate various aspects of the process.

Local Legal Counsel

Identification of Local Legal Counsel

For in-country registration, establishing a field office with local staff, expatriate work permits, review of office leases in foreign countries, and certain other actions, Columbia University needs qualified local legal counsel. It is customary for departments and centers to do their own search, undertaking the following steps:

1. Research reputable law firms in the country.
2. Check with Columbia University's Office of the General Counsel to see if they have any recommendations.
3. Shortlist two or three law firms and obtain their profiles
4. Obtain three references for each law firm (preferably from organizations that have received U.S. government funding).
5. Obtain in writing information about the law firm's retainer fee structure.
6. Submit the profiles, references, and fee structure, along with a recommendation on which firm to select, to the Department Administrator for consideration by the Office of the General Counsel in New York.

Local legal counsel is selected and retained by the University's Office of the General Counsel. **PIs and Country/Project Directors do not have the authority to hire local legal counsel.** Even if a law firm is retained on a consultancy basis for one-time provision of legal services, OGC still must provide prior approval.

Payment of Local Legal Counsel

Local legal counsel should be advised to address all bills to the Office of the General Counsel at the OGC's address and to the PI, Country/Project Director, or Country Finance Director. The PI/director is responsible for reviewing the bills for accuracy, indicating approval of service, and forwarding the documentation to the Department Administrator, who will review the bills and forward them to OGC. OGC reviews and approves the bills and arranges for payment to be sent directly to the local legal firm.

Oversight of Local Legal Counsel

The PI or Country/Project Director and OGC share responsibility for oversight of the work of local legal counsel. Each party is responsible for monitoring the performance of local legal counsel and addressing any issues that arise. However, only OGC is authorized to terminate a contract with local legal counsel.

Country Registration and Agreements

Company Registration

Mailman School departments and centers preparing to establish ongoing operations in a country, as defined in Operational Modality, should determine the need for and the process for registering Columbia University to have a presence and conduct business in that country.

Registration is a complex process requiring that the University's Office of the General Counsel work in close collaboration with local legal counsel, who prepare the articles and memorandum of association/operating agreement and ensure that these are executed. The decision to register as a local entity rests with OGC. See Section 4.2.1 of the ICAP SOPs for guidance that may be useful in the context of other international projects.

Additionally, the Legal Presence section of the Columbia's Global Support site, includes resources that could be helpful when considering the different possibility for a particular project.

MOUs with Government and Tax Exemptions

Memoranda of Understanding (MOUs) established between Columbia University and foreign governments, universities, or other major institutions may be necessary when University projects based outside the United States do not fall under a broader umbrella project. An MOU is not needed when the umbrella project has an existing agreement such as country registration, MOU, and/or bilateral agreement with the foreign entity.

In some countries, MOUs are critical to undertaking work and having any public presence. They allow for hiring of staff, obtaining tax exemptions, opening of bank accounts, and otherwise operating with facility in that country. For optimal implementation of projects, MOUs should be authorized by the highest level government official in-country and/or in accordance with local laws and regulations.

Every MOU must be signed by both:

1. The Executive Vice President for Health and Biomedical Sciences, Dean of the Faculties of Health Sciences and Medicine, Columbia University and

2. The Dean, Mailman School of Public Health, Columbia University.

Their titles and signatures should appear in exactly this way and sequence on the final page of the document.

PIs and Country/Project Directors are not authorized to sign MOUs, and no MOU may be signed without prior written approval from the Office of the General Counsel.

The MOU should detail the purpose, scope, and form of assistance, and the rights and obligations of the University and the government. The University will seek to have the MOU provide for exemption from all taxes for goods and services acquired, and expatriate staff employed by the University. A sample MOU is provided in Appendix 3 of the ICAP SOPs.

Other Legal Registrations

It is possible that other legal registrations will be required or desired between the University and other governmental or independent agencies such as local non- governmental organizations (NGOs). In addition, legal registrations may be needed for projects' satellite offices. **These efforts must be done in conjunction with the Dean's Office and OGC.**

Other Official Agreements

PIs and Country/Project Directors are not authorized to sign legal agreements or contracts. The PI should consult with the Department Administrator to determine current policy on who is authorized to sign the agreement or contract in question. The Department Administrator will consult with the Dean's Office, which in turn will consult the University's Office of the General Counsel as needed for a determination.

Establishing an Office

Establishing an office takes several steps. Select from one of the following topics in the pulldown menu to learn more about the processes involved.

Building Leases

All lease agreements into which the University enters in foreign countries must stipulate the rental cost, lease period, and the rights and obligations of each party. **Note: PIs and Country/Project Directors are not authorized to sign building lease documents.**

The PI or Country/Project Director should negotiate the following lease terms:

1. Since the international project is funded through time-limited grants and contracts, it is preferred that the office lease be for a one-year period and be renewable.

2. To the extent possible, the lease should hold the landlord responsible for maintenance and renovations

3. In areas where electrical power is unreliable, the PI or Country/Project Director should negotiate to ensure that a generator is included with the office or house.

4. The lease agreement must include a Force Majeure clause

5. No lease should include a provision under which there is a disclaimer of liability by the landlord for damages or injury suffered even if due to the negligence or wrongdoing of the landlord.

6. The lease agreement must have a termination clause that allows for early termination of the lease, should it be necessary, without undue penalties.

To process a lease, the PI or Country/Project Director should first have it checked by local legal counsel to ensure that the terms of the lease agreement are reasonable and in compliance with local laws and regulations. The PI should then send the lease and the comments of local legal counsel to the Office of the General Counsel for review and then to the University's Finance Division for approval and signature.

If the project does not have access to local legal counsel for review of leases, the PI and Country/Project Director must work with the Office of the General Counsel on an alternate approach to ensuring that the terms of the lease agreement are reasonable in the local context and are in compliance with local laws and regulations.

Columbia University requires that the lease agreement be signed by the landlord prior to University signatories. The Office of the General Counsel must approve any exceptions to this procedure.

Additionally, the Securing Office Space section of the Columbia's Global Support site, includes additional detailed guidelines that could be helpful when leasing space in another country.

Office Security

The PI or Country/Project Director must take measures to protect University personnel and property. He/she should control access to University-leased facilities by strictly controlling access to and distribution of keys and security access codes.

Note that information on common security practices in a country can usually be obtained from the U.S. Embassy's Security Officer, and by consulting with other organizations (e.g., international NGOs) that have a long-standing presence in the country.

Liability Insurance

The PI is responsible for maintaining adequate liability insurance, in such amounts and configuration, to protect the University and local entity from expected legal liabilities that may arise from the establishment of a local office and the conduct of operations in the locality.

The University maintains only excess insurance for liabilities assumed by the establishment of operations outside of the United States, and then the local entity or local hires/employees are typically not covered unless formally declared to the insurer. Therefore, it is strongly recommended that the international project procure commercial liability insurance (against bodily injury, accidents, death, and damages to other's property) covering all operations and premises of the entity.

The amounts and configuration of this insurance will generally be dictated by local business customs. In some cases, the amount of insurance may be dictated by the terms contained within office lease agreements or other contracts for services to be provided. If no guidance is available, it is suggested that the international project maintain a minimum level of insurance equivalent to US$100,000.

Staffing

An international project with small-scale or major, ongoing field operations by definition involves hiring local staff and/or consultants. Large-scale projects, in particular, usually require a Local Hire Manual, the primary purpose of which is to document additional policies and standard operating procedures that enable local operations and ensure adherence to local laws, especially those pertaining to employment.

For further information on staffing, see Human Resource Management. For details on local hiring, see The Local Hire Manual.

Making Payments

Project staff involved in start-up of a project may request and receive a special travel advance for the purpose of covering initial office expenses in instances where in-country bank accounts have not yet been established. Until bank accounts are established, these funds should be used to procure office supplies, pay for local consultants, and serve as the financial support for start-up of field operations.

In cases where operations are very small and ongoing expenses minimal, this type of travel advance may be used for the duration of the project and no local bank account open. Such arrangements typically require approval first by the Dean's Office and then by the University's Treasurer's Office. See University Financial Reporting for information on obtaining and reconciling special travel advances.

Note that the individual requesting the advance must, in nearly all circumstances, be a Columbia University employee.

Vehicle Procurement

If vehicles are required for the field operations of an international project, the PI or Country/Project Director should lease the vehicles if possible. If procurement is necessary, the vehicles must be purchased by Columbia University or the local entity, not by an individual. All aspects of vehicle ownership must be consistent, with the same entity's name used on the title, the registration, and the insurance. See Vehicle Usage for more information.

Note that vehicles owned by the local entity are not University vehicles and therefore are not subject to University rules about insurance, disposition, and so on. However, they **are** subject to all funding agency regulations.

Management Systems

Initiating operations in a new country or area of the country requires installation of management systems. These depend on the size of the operation and may include, but are not limited to:

- Office filing systems (hard-copy and electronic)
- Information technology systems (see Technology)
- Communications systems (see Communications and PR)
- Grant/contract management systems (see Grants and Contracts)
- Financial management systems, including opening bank accounts and procurement (see Financial Management)
- Travel policies and procedures, including vehicle use (see Travel)
- Human resources systems, including recruitment, hiring, and performance management (see Human Resources)
- Subaward management systems (see Subaward Management)
- Security systems, the complexity of which will depend on the risk in the operating environment

Service and Vendor Agreements

If the international project operates through a local entity and that entity would like to enter into service or vendor agreements or contracts, prior approval is required from the New York office unless the New York office in consultation with Office of the General Counsel authorizes the PI or Country/Project Director to sign.

Exceptions

Prior approval is *not required* if the Principal Investigator or Country/Project Director is authorized by OGC to represent the local entity to sign certain agreements and contracts executed between the local entity and local vendors. The following types of agreements and transactions may be handled at the local level if certain conditions are met:

- Security service agreements

- Vehicle rental agreements

- Local insurance policy

- Utility and telephone service agreements

- Equipment maintenance agreements

- Cleaning services for office premises

- Conference- and meeting-related agreements

- Local professional service agreements

- Maintenance and repair operations – but *not* renovations

For agreements to be handled locally, they must meet all of the following conditions:

- If the standard Columbia University service agreement template has not been used (see Appendix 4 of the ICAP SOPs), local legal counsel has reviewed and approved the agreement in writing

- The maximum monthly value does not exceed $15,000

- The agreement will be in effect for no more than one year

- The contract provides that the locally registered entity has the right to terminate the agreement with 30 days' notification at any time

- The contract is in the name of the local entity and not Columbia University

- Clear terms of service are stipulated, including, as appropriate, a clear Scope of Work and deliverables

- If using USG funds, all USG flow-down provisions for grants and contracts are accounted for in the agreement's language

- There is no indemnity by the local entity in the agreement

- The PI or Country/Project Director signs the agreement on behalf of the local entity

- Execution of the agreement presents no conflict of interest (contracts may not be with relatives of employees)

If the agreement meets all these conditions, the PI or Country/Project Director may sign it. A copy of all signed agreements must be sent to the Department Administrator for forwarding to the University's Office of the General Counsel and Purchasing Office.

Special Provisions

Two special provisions apply for *Security Service Agreements*:

1. The agreement must be signed with the security company and not with an individual

2. The company must be able to prove that a background check has been done on the individuals who will provide security services

One special provision applies for *Vehicle Rental Agreements*: Liability insurance must be provided for each vehicle. In the case of long-term vehicle rentals, local legal counsel must review and approve the insurance agreement.

Health insurance policies *for local employees are negotiated and designed through Columbia University Human Resources in New York.*

Renewals

Agreements handled locally may only be renewed one time (or for a second year) without New York review. For all other renewals, New York review is required.

Other Legal Matters

Litigation

The PI or Department Administrator should notify the Dean's Office as soon as he/she becomes aware of any litigation, threatened litigation, or circumstances that could lead to litigation or to a claim against Columbia University. The Department Administrator serves as the point of contact in these situations and should work closely with the PI, Country/Project Director (if applicable), and Office of the General Counsel until the matter is resolved.

Work Visas for Expatriates

Most countries will not allow non-citizens to work in country without a visa. As such, the lead project person on site must work with local legal counsel to obtain work visas for all University expatriates requiring them.

Hiring Local Staff

In most countries where the University conducts international projects, staff should not be hired unless the entity is legally registered. Without legal registration, the international project should hire local staff on a short-term basis as consultants, using the *Local Consultant Letter Template* found in Appendix 13 of the ICAP SOPs. If and when legal registration is obtained, local legal counsel should guide the process of transferring individuals from consultant to employee status. For more information, see Hiring Staff and Consultants.

Technology

Most international operations will make modest use of technology. The following summarizes key points related to computers and other aspects of information technology (IT).

Those managing large field operations should reference the University's IT guidance and establish written IT policies and procedures, which may be readily adapted from Section 8: Technology of the ICAP SOPs.

- Use computers and other equipment purchased by Columbia University or with University funds only for approved business purposes
- Have in place a system for ensuring all computers are backed up on a regular basis – daily or weekly for some systems and at least monthly for all computers
- Have all users utilize the antivirus and antispyware software installed on their computers to keep them free from malicious threats
- Observe the required safeguards when communicating protected health information (PHI) via e-mail
- Do not install any software or programs on University computers or networks without express permission (contact the Department Administrator, who in turn will obtain the permission)
- Do not copy, store, display, or distribute copyrighted material without the express permission of the copyright owner, except as otherwise allowed under copyright law
- Establish a convention for how files are named

Communications and PR

Most international operations have minimal needs related to communications and publicity. The following summarizes points that are important even for small operations. Those managing large field operations should refer to Section 9: Communications of the ICAP SOPs, to create their own procedures.

- Follow funding agency requirements for co-branding of products
- Obtain written consent from individuals whose name, health information, or images (photos) may be published at some point by the University
- Never create a project website; instead, work with the University's Biomedical and Health Information Services to create a country-specific web page on the MSPH website
- Obtain authorization from the Mailman School's Office of Communications before issuing a press release, even if it is only for dissemination among local media

- Notify the Mailman School's Office of Communications when approached by representatives of the U.S. or international media requesting information, interviews, or tours of University-supported facilities

Grants and Contracts

The guidance and compliance requirements in this section apply to all types of funding or sponsoring mechanisms, which are herewith referred to generically as "grants and contracts."

For policies and procedures relating to subawards, where the international project supports and implements specific activities through subgrants or subcontracts, seeSubaward Management.

PI Responsibilities

As a recipient of grant and contract awards from both U.S. government (USG) and other funding agencies, the University is required to comply with numerous rules and regulations promulgated by those funding agencies. SeeFinancial Management for the PI's stewardship responsibilities as related to financial oversight of grants and contracts.

The PI has similar responsibilities for subawards. To assist with these compliance duties, the PI should make use of the University's Research Compliance and Administration System (RASCAL), which allows tracking of grant/contract information throughout the lifespan of an award, including the pre-award and post-award phases.

Compliance

In accepting a grant or contract from a governmental agency, private foundation, or industry or other funding entity (also known as a "sponsor"), the University is obligated to comply with a number of rules and regulations promulgated by that funding agency.

All funding agencies require compliance with generally accepted accounting principles in the financial and administrative management of programs, while the U.S. government typically provides more specificity than private funders. Among those obligations are requirements related to:

- Effort reporting
- Record keeping
- Financial management
- Procurement
- Property management
- Travel
- Subaward management

It is the responsibility of the PI to know these governing regulations and the associated requirements, and to ensure that all project staff adhere to them.

For further details, see the University's Sponsored Project Handbook.

Pre-Award Expenditures

Pre-award expenditures *are those costs incurred prior to the signing of an award or extension to an award. Pre-award expenditures may be convenient but they are generally discouraged.*

All pre-award costs are incurred at some risk to the University, as the awarding agency is under no obligation to reimburse such costs if the grant or contract is not approved. If the grant or contract is awarded, the funding agency will only reimburse the University's pre-award costs if there is written authorization on their side to do so.

If the funding agency indicates that pre-award expenditures will be approved, these costs must be incurred within the timeframe allowed by the agency. For example, many USG agencies approve pre-award expenditures incurred during the 90 days preceding the award's effective date.

The University uses *advance accounts* to handle pre-award expenditures. For details on what authorization is required and how to establish an advance account, see the University's Sponsored Project Handbook.

Financial Management

See the Sponsored Project Handbook for information on financial management of awards, including charging expenditures, handling cost transfers, and monitoring and reviewing award status.

The Financial Management section of this site complements the Sponsored Project Handbook and has useful information on financial management topics such as procurement, property management, and financial reporting to funding agencies.

Effort Reporting

Requirements under USG Regulations

USG regulations (Section J.10 of Federal OMB Circular A-21) require that the effort devoted to USG-funded projects is appropriately documented, including certification that the salaries charged are reasonable in relation to the effort devoted to those projects. Accordingly, it is University policy that:

- While salary charges to projects are made initially based upon the planned or *estimated* workload of faculty and others, the actual effort of each individual working on projects must be monitored, with charges modified as necessary based on variances between the *estimated* and *actual* effort.

- The required effort reports must be certified by either the individual him/herself (in the case of PIs) or by a responsible official who has exercised suitable means of verification of the activities of the individual(s) for whom he or she is certifying.

The full text of the policy as well as effort-reporting guidance, tools, training information, and other resources are available at the University's effort reporting website.

Principal Investigator Responsibilities

Principal investigators are responsible for:

- Monitoring their own effort and that of others working on their projects

- Notifying the Department Administrator and the funding agency of significant changes in effort throughout the year

- Reviewing appropriate documentation to ensure that charges to projects are consistent with the effort devoted to those projects

- Certifying their own effort and that of staff working on the project using the University's Effort Certification and Reporting Technology (ECRT) system

Award Amendments

Many awards received by Columbia University provide funds for a maximum of one year, renewable for additional periods as appropriate. *All modifications to existing awards must be approved by the Office of Research Administration and negotiated with the funding agency in close collaboration with RA.*

There are several types of modifications, as described subsequently:

- Scope of Work (SOW) amendments

- Budget amendments

- Cost amendments (supplements)

- No-cost extensions (NCEs)

- Cost extensions (continuations)

For further information, particularly in relation to account modifications, see "Account Set Up and Modification" in the Sponsored Project Handbook.

Scope of Work (SOW) Amendment

Any substantive change to the award SOW may require an award amendment or, in extreme circumstances, issuance of a new award. The PI must submit the proposed revised SOW to the funding agency for its consideration and determination.

Budget Amendment

A budget amendment may be required when there are significant changes in the allocation of funds among line items. The University may proceed in accordance with the conditions in the award, which typically allow for reallocation among line items within the approved budget for that budget year, provided that no line item is increased by more than the percentage stipulated in the award.

Any increase greater than the stipulated percentage requires the prior written approval of the funding agency, typically through an amendment to the award.

Cost Amendment (Supplement)

In certain circumstances, the University may request an increased level of funding to support the expansion of a project, to include a minority supplemental award, or to meet unforeseen administrative costs. In such cases, the PI – with prior RA approval – submits to the funding agency a budget and budget justification for the additional cost, and the agency in turn issues a supplement to the award.

No-Cost Extension (NCE)

A no-cost extension is a request to the funding agency for additional time to complete the work without additional funds. For the international project to continue, it must have funds remaining for use during the extension. Extensions are generally granted for no more than one year. The PI should request an NCE prior to the end of the award project period to prevent disruption to project implementation.

Cost Extension (Continuation)

Prior to the end of an existing award, the PI may have the opportunity to apply for a cost extension for an additional period, typically for a full year. A cost extension adds funds to the award budget and extends the project period of performance beyond the previously established end date for the award.

The same guidelines that apply to University review and approval of a proposal apply to a cost extension as well (see Developing International Projects).

PI Transfer or Absence

If a person serving as principal investigator devotes substantially less effort to the work than anticipated in the approved proposal, leaves the University, or otherwise relinquishes active direction of the project, the outgoing PI or another Mailman School person on the project should work with the Department Administrator and the Office of Research Administration to:

1. ensure continuity in the management of the project,
2. specify the level of authority on the project designated to other Mailman School personnel, and
3. properly notify the funding agency.

In exceptional cases, such as the sudden departure of the PI or removal because of a compliance breach, the department chair or center director is responsible for taking action to ensure continuity and appropriate project oversight and direction. However, Mailman School reserves the right to name a temporary or permanent PI at any time.

For more details, see the Sponsored Project Handbook.

Records

Record Keeping and Retention

Both Columbia University and U.S. government policy require all international projects to have clear procedures in place for maintaining supporting and guiding documentation related to each grant or contract funding their efforts.

The PI is responsible for ensuring that the international project meets these requirements and should take steps to:

- Retain any correspondence with the funding agency, any report submitted to the funding agency, or other such exchange
- Establish and maintain electronic and hard-copy filing systems
- Maintain files for:
    - Grant/contract expenditures vs. budget
    - Effort reporting
    - Procurement
    - Inventory, where applicable

For more information on retention and access to research data, see the Sponsored Project Handbook.

Close-Out

The Restricted Funds Division of the Office of the Controller is responsible for the final close-out of grant and contract accounts in the University's Financial Accounting Systems (FAS). An account can be closed out when total project-to-date expenses on FAS agree with the total amount of expenditures on the Financial Status Report (FSR) submitted to the funding agency.

U.S. government regulations require that FSRs be submitted within 90 calendar days following the expiration of either the budget year of the project, or more commonly, following the expiration of a competitive segment of the award. For other funding agencies, reporting formats and deadlines vary and are dictated by the policies of those agencies or stated terms and conditions of the award.

For further information, see Reporting to Funders and Close-Out. More details on responsibilities and close-out steps may be found in the Sponsored Project Handbook. Also of interest are the University policies on *Project Administration Account Closeouts* and *Financial Reporting and Closeout of Sponsored Projects*, available at the University's Policy Library site.

Financial Management

Essentials

The arrangements for financial management of international operations vary from project to project, depending on the financial risk associated with the project. The following checklist is drawn from the ICAP SOPs' lengthy section on this subject. It is a management tool for implementing the essential elements of financial management in more complex, large-scale operations, which typically are categorized as major, ongoing field operations.

PIs may select from the checklist those elements that apply in their context and make their own list to guide staff engaged in financial management of the project. This entails the PI using his/her judgment in establishing control systems and accountability mechanisms, and making provisions for audits.

As stated above, the PI is ultimately responsible for the financial management of a grant or contract. He/she will be held accountable for any audit findings as well as for any disallowances by the funding agency. Disallowances may require allocation of other (unrestricted) funds to cover grant expenses or contract charges that are not allowable under the award (see Limitations on Expenses).

Internal Controls

- Establish, properly document, regularly review, and improve internal controls in field locations
- Enforce Columbia University's conflict of interest policies and avoid all financial and commercial benefit to employees
- Ensure finance staff take the time and effort to properly charge each expense to the appropriate corresponding funding source and sub-code

- If the documentation provided in support of an expense is not adequate proof of payment for one reason or another, have on file an approved Request for Policy Exception or Adjustment

Expenses

For information on allocation of expenses and cost transfers, seeAllocation and Cost Transfer, and for detailed information on limitations on expenses, see Limitations on Expenses   and Travel.

- Ensure relevant staff know what are allowable and allocable expenses and what are valid business purposes
- Translate into English the key points of information on receipts
- Include conference fliers or meeting agendas for reimbursement of conference or training expenses
- Clearly identify the vehicle with which vehicle-related expenditures (operation, maintenance, and insurance) are associated
- Before authorizing any payment, review supporting documentation, question unusual items, and make sure that all necessary information is provided
- When approving expenditures, be cognizant of the approved budget and of what expenses are allowed under each funding instrument
- If there is an electronic funds transfer (EFT) system available, use this instead of checks, especially for payment of staff salaries and for supplies by known vendors

Record Keeping

See Record Keeping and Retention for further information on this topic.

- Keep all financial records, supporting documentation, statistical records, and all other pertinent records for the time period stipulated by the funding agency (for USG agencies, seven years from the date of the submission of the final expenditure report), unless local laws require retaining documents for a longer period
- Ensure that staff who handle records are aware of the record retention policy and that supervisors are overseeing compliance with it

Cash Management

For detailed information on international bank accounts and petty cash funds, see DAF and Cash Management.

- If operating a petty cash fund, have proper internal controls in place
- Have cash in lockable safes that are burglarproof and fire-resistant and kept in a lockable room
- Communicate with the Department Administrator prior to opening, changing, or closing any bank account and obtain University approval when required
- Perform monthly bank account reconciliations

Budgets

- Provide managers with adequate budget vs. actual expenditures reports to fulfill their budget monitoring responsibilities
- Protect the confidentiality of salary information

University Financial Reporting

For detailed information on finance reports and reconciliations, seeUniversity Financial Reporting. For expense reimbursement and replenishment, see Reimbursement & Replenishment. For effort reporting and certification, see Effort Reporting.

- Prepare and submit Finance Reports to the Department Administrator on a monthly basis, including in each report the updated 12-month expenditure forecast
- Make a diligent effort to obtain reimbursement on all value added tax (VAT) paid, and document that effort (see Appendix 35 of the ICAP SOPs)
- Have all staff certify their level of effort on a project

- If funding agencies' representatives in country request financial reports in addition to those that are contractually required, notify the PI and Department Administrator prior to proceeding

Procurement and Property Management

For further information on procurement and USG regulations, seeProcurement. For details on property management including property logs, see Property Management.

- Adhere to assigned authority levels and requirements for purchase orders and bids

- Follow USG restrictions on procurement and to the greatest extent practicable, purchase U.S.- produced and sold goods over foreign goods

- On all purchase orders made with USG funds in the amount of US$25,000 or greater, obtain written certification from vendors that they have not been debarred (prohibited) from doing business with the U.S. government

- Obtain prior approval from funding agencies when purchasing restricted items such as pharmaceuticals

- As required by Mailman School and the funding agency, obtain Mailman School and funding agency approval prior to making an expenditure for building alterations and renovations, subgrants and subcontracts, consultants, international travel, and vehicles and other major equipment

- Maintain a property log recording the purchase of new assets and disposition of old ones, update it at the end of the fiscal year (June 30), and submit it to the Department Administrator by July 15

- Have property insurance at the level required to protect the viability of the international project and in accordance with funding agency requirements and local law

- Lease any required vehicles if possible; if procurement is necessary, have the vehicle purchased by Columbia University or the local entity, not by an individual

- Immediately report any theft or other loss of University property to the Department Administrator, including vehicle accidents

Expenditure Authority

Within a University department, a PI and possibly other officers working on an international project may be granted departmental authorization function (DAF) authority where necessary to allow the project to function efficiently and effectively. DAF authority gives the designated individual authority to approve project expenditures. The PI should work with the Department Administrator to obtain DAF authority or to find out who already has DAF authority and what level of expenditure authority has been accorded to them.

For further information, see the University's policy on Departmental Authorization Function.

Other Financial

For further information see Audits.

- Conduct regular financial oversight visits to project sites

- Keep monthly payroll registers and perform monthly reconciliations of staff salaries to ensure that they are in accordance with the letters of appointment

- Be prepared for audits, e.g., by preparing and filing documentation at the time expenses are incurred

PI Responsibilities

As a recipient of grant and contract awards from both U.S. government (USG) and other funding agencies, the University is required to comply with numerous rules and regulations promulgated by those funding agencies. As such, the principal investigator (PI) has important stewardship responsibilities for the grants and contracts that fund international projects under his/her direction.

These responsibilities are laid out in the University's policy on Principal Investigator Responsibilities for Financial Oversight of Grants and Contracts, available at the University's Policy Library site.

The most important points to keep in mind are:

- Principal investigators are required to exercise oversight of the financial transactions and financial status of each grant or contract sufficient to ensure that charges are reasonable and necessary, allowable under the terms and conditions of the award, properly allocated to and among multiple awards and funding sources, and limited to the funds awarded for the project.

- Although the PI may delegate responsibility for day-to-day financial management of a grant or contract to others within the department or unit and to a Country or Project Director, the PI must exercise appropriate oversight to ensure that charges to each grant/contract are:\

    - As they relate to personnel costs, consistent with the effort expended by those working on the grant or contract (see Effort Reporting)

    - As they relate to costs other than personnel, appropriately charged and allocated to the grant or contract

    - Limited to the funds awarded for the project

    - In compliance with USG and University policies and procedures

DAF & Cash Management

The following section highlights key points in the University's *International Banking, Expense Reimbursement, and Replenishment Policy*, which provides requirements for reimbursement of international business expenses and replenishment of international bank accounts, while establishing internal controls over University assets to minimize the University's risk of financial loss. PIs and Country/Project Directors should be familiar with the University's full policy.

Cash Management Set-Up

For business purchases and expenditures in the conduct of University business, payments may be made using credit/purchasing cards (p-cards), wires, checks, or cash. Whenever possible, the proper University purchasing mechanism – e.g., a purchase order or a p-card – should be used. See Procurement for guidance on how to choose the appropriate procurement mechanism.

The size of the field operation will determine how cash management is arranged. Options include:

- Travel Advance*: For those situations where p-cards or bank accounts are inappropriate, e.g., where an operation is very small and has minimal ongoing expenses, the University allows for cash advances to a designated University officer. The officer requests and receives a "special" travel advance for the purpose of covering operational expenses in the field. See Establishing an Office: Making Payments for details.*

- International Bank Account*: International projects with ongoing field operations will likely require at least one bank account for purposes of cash security and effective internal controls. In many cases, a project may need both a local currency account and a U.S. dollar one. See below for information on establishing accounts.*

- International Bank Account(s) and Petty Cash Fund*: A major, ongoing field operation may require a petty cash fund. See below for details on the establishment and management of a fund.*

International Bank Accounts

Only the Columbia University Executive Vice President for Finance and the Columbia University Treasurer may authorize the opening of a new bank account.

Choosing a Bank*: To begin the process of setting up an international bank account, the PI or Department Administrator should contact the Mailman School Associate Dean for Finance. Project staff should research banks in the operating area and, whenever possible, select a reputable one that has a global correspondent bank (such as Citibank, Bank of America, HSBC, or JP Morgan Chase), sound knowledge of local market practices, comprehensive and customized local services, electronic banking capabilities, and, ideally, a retail franchise. Columbia University has ongoing relationships with certain banks and prefers that they be used by international field offices whenever possible. The list of those banks may be obtained from the Associate Treasurer and includes:*

- Citibank, NA

- Standard Bank

If none of Columbia University's preferred banks have branches in a particular country, then project staff should propose to the Associate Treasurer the most suitable bank. The proposal must include a justification about the proximity of the proposed bank to field operations, size of the branch network, and overall service history of the proposed bank compared to University-preferred banks. The Associate Treasurer makes the final determination on the selected bank.

Opening an International Bank Account: *The Associate Treasurer will require several documents, including a memo requesting the new account. He/she will send these to Office of the Treasurer and the Office of General Counsel. See the full policy on international banking for the list of what to include in the memo and what else should accompany it.*

All bank signatories must be Columbia University employees and the signature cards must include three finance division officers: the Executive Vice President for Finance, the Treasurer, and the Associate Treasurer, and a similar number of signatories from the school or department, such as the Vice Dean for Finance & Administration, PI, or Country/Project Director. There may be more than one signatory in country, which is recommended if the primary signatory travels frequently.

Funding an International Bank Account: *After receiving approval, the field office will be given a reasonable number of days of cash (to be determined together with Columbia University's Office of the Treasurer) to perform current operations and projects. The amount is based on the field office's monthly budget-vs.-actual review and is usually 60 to 75 days' cash supply.*

The field office must also reconcile the international bank account on a monthly basis – or on a weekly basis if funds are required more frequently. Reconciliation ensures that the sum of the outstanding reimbursements, cash, and advances is equal to the amount recorded in the general ledger. See Reimbursement & Replenishment for procedures on reconciliations for bank account replenishment.

Note that approval from the Office of the Treasurer must also be obtained to amend or close an international bank account.

Petty Cash

An international field office with a **local bank account** may establish a petty cash fund of **up to $500 or the local currency equivalent**, if such a fund is required to allow for the reimbursement of minor approved business expenses **not to exceed $80 or the local currency equivalent**.

The establishment of the fund must be done in consultation with the Department Administrator, who will seek approval from the Columbia University Office of the Controller.

All petty cash funds must operate in accordance with Columbia University's policy on *Petty Cash*. The policy requires that petty cash funds be established and used only for the following authorized purposes:

- For qualifying payments to human subjects engaged in research activities
- Necessary *and* reasonable *small business transactions*
- Emergency *purchases of office supplies*
- Necessary *and* reasonable *food (such as sandwiches and beverages) brought into the office for business meetings*
- Local transportation, parking, and tolls (all airfare, train tickets, and car rentals must be submitted through a *Travel and Business Expense Report*)

Petty cash may not be used to reimburse purchases made on credit cards or debit cards, nor for travel advances or any other kind of advance.

Any deviation from the $500 and $80 caps or other aspects of this policy requires prior written approval from the Mailman School Associate Dean for Finance or Vice Dean for Finance & Administration.

Reimbursements: *For each expense, an individual must submit a completed petty cash voucher or log accompanied by original receipts. The petty cash voucher or log must provide the following:*

- Date of purchase
- Printed or typed name of the person reimbursed
- Description of the item purchased, including a valid business reason

- For business meals inside the office, documentation of the business purpose of the meeting and list of those in attendance, if 10 or fewer people, or the number of attendees, if the group is larger than 10 people
- For transportation, the origin, destination, and business purpose
- Amount (not to exceed $80 or local currency equivalent)
- Original receipt
- Signature of the person who received payment
- Signature of the custodian who approved the reimbursement

(Pads of petty cash slips may be obtained from the Office of the Controller, should the international project choose to use them.)
The custodian may not approve his or her own petty cash voucher/log or that of his/her supervisor. If an exception must be made, this requires prior written approval of the Department Administrator, who will ensure compensating internal controls are in place.

Reconciliation*: As per University policy, the custodian is expected to perform a monthly reconciliation between the authorized amount of the fund (US$500, or other) and cash and receipts on hand. The custodian should use the* Petty Cash Reconciliation Tool*.*

Replenishments*: The replenishment request must include the worksheet listing all the disbursements and the original receipts in an accompanying envelope. The PI, Country/Project Director, or his/her designee (not the custodian) must review the accuracy of the request and ensure all supporting documents are attached. The check payment for the replenishment of the fund must be done in the name of custodian.*

Monitoring*: The PI, Country/Project Director, or his/her designee is expected to conduct unscheduled cash counts and checks at least quarterly to ensure that the custodian is abiding by all the rules and regulations.*

Security: *It is the petty cash custodian's responsibility to provide adequate precautions for the safekeeping of the funds under his/her control. All petty cash funds must be stored in a secured device such as a safe or cash box in a locked cabinet. Only the custodian and PI, Country/Project Director, or his/her designee should have keys to the box and cabinet. Funds should never be left unattended and unsecured.*

Closing a Petty Cash Fund*: The custodian of a petty cash fund must close the fund immediately if the purpose for which the fund was established ends or changes significantly. The fund should be reconciled and any excess cash returned to the bank account and signed off by the PI, Country/Project Director, or his/her designee.*

Changing the Custodian: *To change the custodian of a petty cash fund, the current custodian must reconcile the fund and the PI, Country/Project Director, or his/her designee must sign the reconciliation form, and then transfer the fund to its new custodian.*

Segregation of Duties

The duties of collecting cash, maintaining documentation, preparing deposits, and reconciling records should be segregated among different individuals. In offices where the separation of duties is not feasible, strict individual accountability and thorough management supervision and review are required.

Limitations on Expenses

OMB Circular A-21, *Cost Principles for Educational Institutions*, issued by the USG's Office of Management and Budget, contains specific language which precludes or limits charging certain expenses to USG grants and contracts. These expenses include specifically:

- unallowable costs,
- clerical and administrative salaries, and
- office supplies.

Unallowable Costs

Unallowable costs are costs incurred by the University that do not meet the criteria for *allowable costs*, which are:

- The cost is reasonable for the performance of the award, and

- The cost is in conformance with any limitations or exclusions set forth in the USG cost principles applicable to the recipient's organization or in the Notice of Award, and

- The cost is consistent with University policies and procedures

Unallowable costs include alcoholic beverages, entertainment, and membership in non-professional organizations. See Lodging, Meals and Incidentals for unallowable travel expenses.

In order to ensure that the University does not inadvertently include any unallowable expenses in its direct or indirect charges to grants and contracts, unallowable expenses have been assigned a special series of sub-codes. For the list of sub-codes and full text of the policy, see the University's policy on Subcodes for Segregation of "Unallowable" Expenses.

Clerical and Administrative Salaries

Clerical and administrative salaries generally may not be charged directly to USG-sourced grants and contracts. There are important exceptions to this rule, usually when:

- The salaries have been explicitly budgeted on the USG project, and

- The individuals involved can be specifically identified with the project or activity

Accordingly, it is vital that PIs fully justify in grant and contract applications those situations where administrative and clerical support is necessary to the project, whether because the nature of the work performed under a particular project requires an extensive amount of administrative or clerical support, or the tasks to be performed under a particular project relate specifically to the technical substance of the project.

For details about the requirements, as well as examples of situations where it is appropriate to directly charge these salaries, see the policy on Charging Administrative and Clerical Salaries to Federal Grants and Contracts.

Office Supplies

Office expenses, such as postage, office supplies, and local telephone calls, generally may not be directly charged to USG-sourced grants and contracts, because they should normally be treated as indirect costs.

There are important exceptions to this rule, as explained in the University's policy on Charging Office Supplies and Other Administrative Expenses (Other Than Salaries) to Federal Awards.

Allocation and Cost Transfer

Monitoring of Expense Allocations

Funds provided by USG and non-USG funding agencies generally require that those resources be accounted for on a project-by-project basis, and therefore cannot be commingled. Good financial management requires that those responsible for expending awarded funds exercise appropriate oversight over the sources and uses of those resources.

As laid out in the University's policy on *Monitoring and Reconciling Project Accounts*, PIs and those that assist them in assigning expenditures to funding are required to exercise regular oversight over the financial records of each project. See the University policy for the full set of monitoring requirements.

Cost Transfers

PIs and other project staff must make every effort to allocate their project costs to the appropriate account(s) at the time the costs are incurred. However, in certain circumstances, it is permissible to transfer costs from one account to another. This is known as a cost transfer. Such cost transfers are allowable only when:

- There is a direct benefit to the project account being charged, and

- The cost transfer is accompanied by appropriate documentation

Cost transfers must be prepared and submitted within 90 days following the end of the month in which the original charge was posted to a University account; thereafter, cost transfers are not permitted except in extenuating circumstances.

Cost transfers that remove expenditures from projects are not subject to the 90-day time limit, and must be processed immediately when it is determined that an expenditure charged to a project is not appropriate to that project. A strong justification must also be provided.

For the full text of the policy see Columbia University Policy on Sponsored Project Cost Transfers.

University Financial Reporting

Projects with No International Bank Accounts

If an international project is financed through a **special travel advance** to an individual, he/she must submit on a monthly basis a Travel and Business Expense Report with accompanying receipts to clear the advance for expenses incurred during the month and/or request additional money. If a second travel advance is needed, a memo with a detailed explanation and Department Administrator approval must be included with the expense report.

Depending on the procedures of the department or center, the TBER should be reviewed and/or approved by the Department Administrator, then forwarded to Accounts Payable *within 45 days of the end of the month.*

This is the only form of reporting and reconciliation required in the case of an international project financed through travel advances.

Projects with International Bank Accounts

A project **with international bank accounts** must submit to the Department Administrator a monthly package of documents that constitute a Finance Report. The monthly Finance Report must contain the following:

1. Expense Worksheet: *A worksheet recording all detailed expense transactions, with conversions to U.S. dollars in the case of expenses incurred in the local currency*
2. Supporting Documentation: *Support for each transaction in the form of either original or photocopied documentation*
3. VAT Documentation: *Documentation of value added tax (VAT) submissions (see Procurement)*
4. Bank Reconciliations: *The bank reconciliation(s) from the prior month*
5. Check/Wire Request: *A completed check or wire request form with the replenishment amount and account(s) and sub-codes*
6. 12-Month Forecast: *An updated 12-month (rolling) forecast with the period budget, the period actual expenditures, an explanation of variance (with a plan for correction, when appropriate), and support for significant changes (if any)*

Reconciliations – Projects with International Bank Accounts

The field office must perform several reconciliations as part of its reporting process and general management responsibilities:

- The field office must reconcile the international bank account on a monthly basis – or weekly, if funds are required more frequently. Reconciliation ensures that the sum of the outstanding reimbursements, cash, and advances are equal to the amount recorded in the general ledger.
- Petty cash reconciliations must be done on a monthly basis, reconciling the authorized amount of the fund against cash and receipts on hand.
- If managing a payroll, the field office should keep monthly payroll registers and perform monthly reconciliations of staff salaries to ensure that they are in accordance with staff's letters of appointment.

For further information on financial reporting, expense documentation requirements, and reconciliations, see the University's International Banking, Expense Reimbursement, and Replenishment Policy.

Reimbursement & Replenishment

If an international project is financed through a special travel advance to an individual, he/she receives reimbursement through submission of a *Travel and Business Expense Report*, as described in University Financial Reporting.

In other cases, international operations have a bank account or accounts, for which the expense reimbursement and replenishment procedures are covered in this sub-section.

Departmental Processing

The Department Administrator is responsible for departmental/center review of the international project's Finance Report as follows:

- Ensure starting bank balances on the reconciliation forms are identical to the prior month's ending bank balances

- Ensure "in-transit" items on the prior month's reconciliation have been charged to the bank statements

- Review spreadsheets for mathematical accuracy

- Determine that documentation for expenses is complete and correct

- Ensure correct sub-codes are used

- Check that advances have been closed within a month and if not, that an explanation is provided in the report

- Determine that the reconciliations are correct

The Department Administrator or his/her designee then must:

- Prepare a reconciliation between the Field Finance Report and Columbia University's Financial Accounting System (FAS)

- Prepare a Wire Request Form with the replenishment amount and account(s)/sub-code(s), basing the request on the forecast (assuming the project is ongoing)

- Within 45 days of the month's end, prepare and submit a Travel and Business Expense Report for Mailman School review and entry into the University's automated invoice processing system, AP/CAR (Accounts Payable/Controlled Analytical Review)

- Send to Accounts Payable the Finance Report with the TBER as the cover sheet and with documentation of each expense attached

For more information on the procedures for clearing advances and recording expenses in FAS, see the University's International Banking, Expense Reimbursement, and Replenishment Policy.

Bank Account Replenishment

Upon receipt of a complete Finance Report, reconciliation of the prior month to FAS, and completed Wire Request Form, the Office of the Treasurer approves funding for bank account replenishment – assuming the project is ongoing.

The Office of the Treasurer will wire either U.S. dollars or local currency directly to the appropriate international bank account. In certain cases, replenishment may take place before the department or center has fully completed the reconciliation process, to prevent disruption in project execution.

Procurement

General Procurement Procedures

All funding agencies use the terms and conditions of their awards to govern the use of the resources. In addition, with U.S. government funding there are statutes, government-wide directives, and regulations with which Columbia University must comply. It is the responsibility of the PIs and Country/Project Directors to know and ensure adherence to these governing regulations as they apply to procurement, as well as to other aspects of operations. Requirements include:

- All bids/quotes must be in English or key elements must be translated

- Pro forma invoices may be used as quotes, but are not acceptable for payment – stamped receipts from the vendor are required

- The required bids/quotes must be attached to the expense documentation – or a written explanation must be provided (see the*Sole/Single Source Justification Form*, available in Appendix 17 of the ICAP SOPs)

In addition, all expense documentation must clearly indicate:

- A clear description of what the vendor provided, making it evident whether they were goods or services

- In the case of services, the location (including country) in which they were provided, and if in more than one location, the partial allocations by location

Procurement Using USG (Federal) Funds

The University policy on Procurement Using Federal Funds provides information on the documents and provisions governing USG-funded projects, including OMB Circular A-110 for grants and cooperative agreements and the Federal Acquisition Regulation (FAR) for contracts. The policy may be found at University policy library.

It is the responsibility of the PI and Country/Project Director to ensure that USG funds are not used to procure from federally debarred vendors and are not used for prohibited and restricted goods and services, including pharmaceuticals.

Note that CDC, USAID, and other USG entities require specific approval prior to making an expenditure for the following:

- Alterations and renovations of buildings

- Subgrants and subcontracts

- Consultants

- Vehicles

- Other major equipment having a unit cost greater than a set level, such as US$5,000

Note also that competitive bidding is required for most purchases. Where stated requirements are not met, a signed *Sole/Single Source Justification Form*(Appendix 17 of the ICAP SOPs) must be on file. For procedures that may be helpful, see Section 6.12 of the ICAP SOPs.

Value Added Tax

U.S. government regulations require that all value added tax (VAT) be reimbursed, which in turn requires that each international project with USG funds make a diligent effort in this area. A *Documentation of Submission for VAT Reimbursement Form* (Appendix 35 of the ICAP SOPs) must be submitted as part of the monthly Finance Report. For more information, see Sections 6.9.11 and 6.12.15 of the ICAP SOPs.

NY-Based Procurement Mechanisms

Those responsible for purchasing goods and services must utilize the most appropriate mechanism to do so. The University's Procurement Mechanisms Policy is designed to maximize the efficiency and convenience of the purchasing process, consistent with good business practices, and in full compliance with all applicable USG regulations. The policy provides guidance concerning the choice of the most appropriate procurement mechanism, as summarized below:

1. Central Purchase Orders: *A central purchase order is a document issued to a vendor by the University's Purchasing Office confirming an agreement for the supply of goods and services. Central purchase orders must be used: 1) to execute most service agreements, and 2) to complete the acquisition or lease of most goods and capital equipment where the agreed price is in excess of $2,500 and for which a p-card may not be used.*

2. EZPO*: An EZPO is a document issued to a vendor by a school or department confirming an agreement for the supply of certain small purchases of goods without review by the Purchasing Office. It may be used for small purchases of goods valued from $501 to $2,500, where it is not feasible or desirable to utilize a p-card. EZPOs may also be used for certain larger purchases from University-wide Purchasing Agreement (UwPA) vendors in amounts up to the maximum contract-specific dollar threshold specified by the Purchasing Office.*

3. Blanket Purchase Order*: A blanket purchase order is a blanket order issued to a vendor by the Purchasing Office for a small number of repetitively purchased goods where it is impractical to issue a separate purchase order for each requested delivery. Blanket purchase orders may be used where all of the following conditions apply: 1) the order is for a fixed period; 2) the order is for a specified set of items; 3) the order defines an agreed price for each item; 4) the number of items covered by the order is limited, generally to 25 or less; and 5) releases against the order are documented in a manner that allows each release to be tracked, audited, and reconciled to receipt and payment records.*

4. P-Card: *A p-card is a credit card that authorized University personnel may use to purchase goods and services for use by the University. It is the preferred purchasing mechanism for most goods and minor equipment valued at $2,500 or less, and for certain larger purchases that do not require a central purchase order. The p-card is also the preferred purchasing*

mechanism for small dollar purchases of certain regularly purchased services and for certain larger purchases from UwPA vendors.

5. Direct Payment by Accounts Payable: *Direct payment by Accounts Payable may be used regardless of dollar value for purchases of goods or services that do not require a purchase order of any kind and where another purchasing mechanism is not preferred or required as outlined elsewhere in this section. Examples include honoraria, printing services, and legal fees approved by the Office of the General Counsel.*

Those engaged in purchasing should be thoroughly familiar with the full text of the University's Procurement Mechanisms Policy. Employees are also encouraged to make use of the University's online Interactive Purchasing Guide, which assists with selecting the best procurement mechanism.

Field-Based Procurement Mechanisms

When an international field office is unable to procure certain goods or services through New York or such arrangements are unwieldy, costly, and inefficient, then the field office may proceed with direct procurement locally. In such cases, proper procurement procedures must be established in writing and compliance with them enforced.

For local payments, preference should be given to using checks or electronic transfer of funds instead of cash. When paying for large procurement transactions, it is wise to arrange for vendors to be paid directly through a wire transfer from New York.

If the international project operates through a local entity and that entity would like to enter into service or vendor agreements or contracts, **prior approval is required from the New York office unless the New York office in consultation with Office of the General Counsel (OGC) authorizes the PI or Country/Project Director to sign.**

Prior approval is **not required** if the Principal investigator or Country/Project Director is authorized by OGC to represent the local entity to sign certain agreements and contracts executed between the local entity and local vendors. See Service and Vendor Agreements for details.

Property Management

Both Columbia University and the U.S. government have policies and procedures for property management. For USG-funded projects, the applicable provisions are in the Code of Federal Regulations (CFR) in Sections 45 CFR 74.31 through 74.37. These provisions set forth uniform standards governing management and disposition of property furnished by the U.S. government or whose cost was charged directly to a project supported by a USG award.

PIs and Country/Project Directors are responsible for the safekeeping of all Columbia University and USG assets used in their international projects, regardless of dollar value. This includes the maintenance, secure storage, proper use, and appropriate tracking of assets. Examples of systems and procedures that PIs or Country/Project Directors could establish may be found in Section 6.13 of the ICAP SOPs. The following highlights the key requirements.

Property Logs

Columbia University's policy is to record all equipment and any other property that would not normally be consumed throughout the course of a project. In line with prudent financial management, Columbia University policy, and U.S. government regulations, international projects must maintain a property log (inventory) of all non-expendable property with an expected service life of 1 year or more and with a unit cost of more than US$500, including taxes, shipping, duties, installation, and related charges.

In addition, the Property Log must include expendable equipment, supplies, or commodities with a total transaction cost of more than US$2,000 including taxes, shipping, duties, installation, and related charges.

- Examples of expendable property are desks, chairs, fax machines, and modems
- Examples of non-expendable property are pencils, staplers, and ink cartridges

Note that the stricter Columbia University standard, which uses a lower acquisition amount than USG funding agencies, is the one that international projects must follow.

The log must contain data as specified by the University and the funding agency and must be updated regularly as assets are purchased and disposed of. At the end of the fiscal year (June 30), the project must complete an up-to-date version of the property log

and submit it to the Department Administrator by July 15.

Often more than one property log is required:

- There must be a separate property log for each grant or contract with whose funds property is procured

- Satellite offices or sub-offices must maintain a property log, which when submitted on a regular basis to the main office, provides data for updating the field office's property log

- Each subrecipient organization that has procured property with University-awarded funds must complete a property log and submit it annually to the international project

Insurance Coverage for Damage to or Loss of Property

Since the University does not provide coverage for loss or damage to property outside of North America, it is the PI's or Country/Project Director's responsibility to procure the types and levels of insurance coverage that an international project will obtain against loss, damage, or theft of real property and equipment. In making this decision, the PI or Country/Project Director might consider:

- What level of investment does the project have in real property and equipment?

- What level of insurance is required to protect the viability of the international project? Could the project replace lost or stolen property and continue operations?

- What level of insurance is required by the funding agency? Does local law dictate a higher level or more comprehensive insurance coverage? (If so, local law must be followed.)

In the event of property loss through theft or any other means, the PI or Country/Project Director should report the loss to New York and/or the funding agency if appropriate for that type and level of loss, and in accordance with University and funding agency guidelines. It is usually important to obtain documentation of the loss in the form of a report from an independent party such as the police. Note that funding agencies may require the University to obtain their approval before using grant/contract funds to replace a lost asset.

If the aggregate value of property owned or leased in conjunction with any individual research project is substantial (e.g., greater than US$500,000), University central administration, through the Office of Risk Management, is available to assist with the procurement of necessary insurance coverages.

Disposition

Disposition of major assets must be done in accordance with the procedure and conditions specified in the funding award. Prior funding agency approval may be required to sell or donate an asset. For smaller items not classified as major equipment, these may be disposed of in an appropriate manner as determined by the PI or Country/Project Director in consultation with the Department Administrator.

Reporting to Funders

Funding agencies that support international projects, whether USG or other, require timely submission of financial reports. To fulfill funding agencies' requirements for timely submission of financial reports, theColumbia University Policy on Financial Reporting and Closeout of Sponsored Projectsprovides full guidance. See also the sections on financial management and on close-outs in the University's Sponsored Project Handbook.

During Project Implementation

Most important for PIs and Country/Project Directors to keep in mind are the following points:

- The Restricted Funds Division of the Office of the Controller ("Restricted Funds") is responsible for the preparation and submission of financial reports to funding agencies.

- For USG funds, Financial Status Reports (FSRs) must be submitted within 90 calendar days following the expiration of either the budget year of the project or, more commonly, following the expiration of a competitive segment of a project. For other

funding agencies, reporting deadlines vary and are dictated by the policies of those agencies or stated terms and conditions of the award.

- PIs and Country/Project Directors are responsible for the ongoing review and monitoring of charges to each project, and for providing accurate and timely reconciliations on which to base those financial reports.

- In addition, PIs and Country/Project Directors are responsible for ensuring that necessary charges and adjustments are processed such that the expenditures reflected on financial reports agree with those recorded in the University's accounting records for each project. (An adjustment is an action to correct a charge to a wrong account or wrong project.)

Reconciliations must be submitted to Restricted Funds no later than 30 days prior to the date that the financial report is due to the funding agency.

At Grant/Contract Close-Out

Financial Status Reports are usually required by the funding agency within 90 days after termination of the budget period or project period of a grant (consult the relevant Notice of Award). Restricted Funds is responsible for preparing and submitting these FSRs. The process is as follows:

- A reconciliation report based on expenditures and commitments in Columbia University's ledger is forwarded by Restricted Funds to the responsible department within 20 days of a grant/contract's termination, even when the awarding agency does not require submission of an annual FSR

- Departments are responsible for completing the reconciliation reports, signing them, and returning them to Restricted Funds promptly

- Any adjustments reflected on the reconciliation reports must be fully documented

- Restricted Funds sends the FSR to the agency, where required, and sends a copy to the Department Administrator and PI

Compliance with FSR due dates is important to avoid adverse action by the funding agencies, such as withholding of payments, suspension of future award activity, or payment of penalties that would be charged to the PI's department or center.

For further information on close-out requirements and specifically on PI responsibilities, see Close-Out and the University's Policy on Financial Reporting and Closeout of Sponsored Projects.

Overexpenditure of Project Funds

If the close-out reconciliation indicates an overdraft balance, the PI or Department Administrator must provide an acceptable alternative account number to absorb the overdraft. For further information, see theUniversity's policy on Overdrafts on Sponsored Project Accounts.

Underexpenditure of Project Funds

When there are unspent grant/contract funds at the end of the award period, the balance may be returned to the funding agency or the University may request a no-cost extension. In the latter case, see Award Amendments for information on this process.

Audits

The University's Restricted Funds Division is responsible for the coordination of all grant/contract audits.

If a PI or Country/Project Director is contacted directly by an auditor (USG or other), he/she should notify the Mailman School Dean's Office and refer the auditor to Restricted Funds. For further information, see the University policy Project Administration – Audits.

Travel

To the extent possible, these procedures capture U.S. government (USG) restrictions on travel that is funded by USG sources. Those working on international projects with USG funding are expected to know and follow these restrictions.

In addition, NY hires must follow Columbia University's *Travel Expense Policy*, which is available in the University's Administrative Policy Library.

Authorization

Prior to traveling outside the immediate area where an employee is based, he/she must obtain written travel authorization from the principal investigator (PI) or his/her designee.

In the case of international travel funded by a USG entity, prior approval from the funding agency must be obtained. See Section 7.2.3 of the ICAP SOPs for further guidance.

Travel Advances

In some instances, employees may wish to apply for a travel advance to cover the out-of-pocket costs of business-related travel. Requests for travel advances exceeding $500 should include a description of the circumstance that requires the advance and a brief budget of expenses.

Travel advance forms may be obtained from the Medical Center's Business Office, Accounts Payable. When completed and approved, the travel advance form must be submitted to Accounts Payable for processing.

A travel advance given in a field office is to be made in local currency for in-country travel and U.S. dollars for international travel. Advances from New York are made in U.S. dollars.

Once the advance payment is issued, it is the employee's responsibility to follow the appropriate procedures relating to travel and expenses. The advance is cleared (reconciled) through the submission of a Travel and Business Expense Report (TBER) which should be presented within 10 business days of completion of travel and must have all supporting documentation including boarding passes. **This deadline applies for both local and international travel**.

For further information, see the time limit on reimbursement submissions in Expense Reporting, as well as the University's *Travel Expense Policy*.

Note that if an employee fails to clear an advance within the indicated timeframe, the funds will be considered taxable income to the employee.

Air Travel

It is suggested that a traveler make arrangements for travel through either a University designated travel agency or a University preferred vendor.

USG Regulations

All USG funds are subject to the "Fly America Act," under which all flights must be booked on a U.S. flag carrier or "code share" airline. The *US Flag Carrier Policy* is available on the University's Research Administration webpage.

Travelers should carefully note the specific rules regarding code sharing, as they are restrictive and must meet specific criteria to qualify. If travel is charged to a USG funding source and a foreign carrier is used, the department or traveler may provide any of the following types of documentation to demonstrate that the expense is allowable:

- A completed **Certification of Unavailability of U.S. Carrier** (Appendix 46 of the ICAP SOPs) to document that the U.S. Flag Carrier Policy exception was met
- A copy of the section of the grant/contract award or budget that allows foreign air carriers
- Written approval from the Department Administrator

The documentation must be attached to the invoice for the airline ticket.

Travel Class

Columbia University guidelines and USG travel regulations stipulate that all tickets purchased must be for coach or economy class travel. The rules call for selecting the lowest-cost carrier and most direct route. If a traveler would like to use a preferred airline carrier or route at an additional cost, the traveler must pay Columbia University the difference between the lowest cost ticket and the actual cost.

Exceptions to the coach/economy class rule may occur in very limited circumstances, e.g., business-class travel is allowable when the scheduled in-air flying time exceeds five hours. See the Travel Expense Policy. *Note*: Mailman School rules on these exceptions may supersede those established by the University.

Layovers

The cost of a day room or hotel room is a reimbursable expense, if the traveler has a forced layover in an airport for eight hours or more. The cost limit is the per diem lodging rate for a hotel room in the country where the forced layover occurs. (See the rates at the State Department'sOffice of Allowances). The cost of the room should be submitted on the TBER form and a receipt attached.

Lodging, Meals & Incidentals

In the University's Travel Expense Policy, the traveler may find detailed instructions on what expenses are allowable, what documentation is required, and what exceptions may be considered.

The following is of particular note.

Lodging

The University will reimburse travelers for the cost of their rooms and any applicable taxes and fees when traveling on approved University business. The traveler must submit an original itemized hotel bill. The amount of reimbursement for lodging is either the actual hotel rate per day **or** the per diem amount (see Per Diem), *whichever is less.*

When possible, the University's preferred hotel properties should be utilized.

Meals

The University reimburses employees for meals during travel on University business. Business meals are reimbursed on an actual basis and should not exceed the thresholds indicated in the *Travel Expense Policy*. Travelers must submit individual receipts showing the actual cost of each meal.

For information about the use of per diems for meals and incidental expenses, see the Per Diem section.

Miscellaneous Travel Expenses

In the course of travel, a traveler may incur additional reasonable expenses that are eligible for reimbursement. These include:

- Baggage handling and storage expenses
- Business office expenses (copy services, postage, etc.)
- Business-related phone calls (including cell phone), faxes, Internet connectivity, including those necessary to obtain transportation and hotel reservations
- Up to three personal calls per day of reasonable duration
- Currency conversion, automatic teller machine (ATM), and traveler's check fees
- Excess baggage fee due to the size or weight of an item being transported at the request of the University
- Reasonable and usual gratuities to porters, bellhops, and other service personnel
- Laundry or cleaning expenses on trips lasting over five days

Unallowable Travel Expenses

The following miscellaneous expenses are non-reimbursable. University policy considers these expenses to be either personal, unnecessary, or avoidable expenses incurred during travel. As a result, there may be tax consequences to the travelers if reimbursed. These non-reimbursable expenses include:

- Airline or VIP club membership dues or one-day admission fees
- Airphone usage
- Baby-sitting
- Clothing or toiletry items

- Excess baggage costs related to personal property

- Expenses incurred by family members or other non- Mailman School staff

- Expenses related to vacation or personal days taken before, during, or after a business trip

- Helicopter services for local travel/entertainment

- Laundry or cleaning expenses on trips lasting five days or fewer

- Loss or theft of cash advance money or airline tickets

- Loss or theft of personal funds or property

- Lost baggage

- Luggage and briefcases

- Magazines, newspapers, personal reading materials

- Medical expenses while traveling

- Movies

- "No show" charges for hotel or car service

- Personal entertainment

- Personal travel unrelated to project work

- Pet care

- Recreational expenses

- Saunas, massages, spa visits

- Services of barbers and hairdressers

- Shoe shines

- Souvenirs or personal gifts

- Telephone calls in excess of three personal calls each day

- Tourism

If a business reason exists for any of these purchases, a Policy Exception or Adjustment Request must be submitted.

Prohibited Items

The following items are prohibited; that is, they cannot be charged to the funding agencies, in accordance with U.S. government and Columbia University policies and regulations:

- Alcohol

- Cakes

- Charge card delinquency assessments

- Construction

- Contributions or donations

- Entertainment

- Fines, penalties

- Flowers

- Food or coffee (unless for a valid business meeting)

- Gifts

- Household staff payments

- Laundry

- Lobbying

- Medical expenses for expatriates and non-employees

- Parties (including retirement parties)

- Personal (non-business-related) items

- Personal loans

- Taxes, including VAT

- Travel accident insurance premiums

- Traveler's checks' fees

Per Diem

Applicability

Per diem is a maximum travel allowance to be applied to lodging, meals, and incidental expenses associated with approved business travel. The use of a per diem by Mailman School travelers should be rare.

Per diems may only be used in two instances:

1. Where local custom or culture makes it difficult to obtain receipts*: The University has a waiver such that travelers are not required to receive prior approval to use per diems in resource-poor countries. However, the traveler should submit with his/her TBER an approved Policy Exception or Adjustment Request.*

2. Where the international project is funded by a grant or contract that allows per diem for travel *under the terms of the grant or contract, as documented in the budget, award documentation, or separate written approval from the funding agency.*

Claiming Per Diem

If a per diem is to be claimed, the traveler must select per diems for the duration of the trip, i.e., the traveler cannot alternate between per diem and actual receipts.

Per diem is only given if travel is conducted outside the traveler's home city and if the trip exceeds 12 hours.

It is the responsibility of the employee to know and calculate the current per diem rate when submitting the TBER. The per diem rate consists of two elements:

1. A maximum rate for daily lodging expenses

2. A rate for meals and incidental expenses (M&IE)

Rates and Documentation for International Travel: Columbia University uses the U.S. government per diem rates for resource-poor localities around the world. Three figures are provided: the maximum lodging amount, the M&IE rate, and the total of these two, which is the maximum per diem rate. The rates are updated on a regular basis and are published on the U.S. State Department Foreign Per Diem website.

A printout from the website showing the per diem effective date and amounts must be provided as the source document for per diem expenses claimed on a TBER. If a per diem reimbursement rate exceeds the USG rate, the excess amount over the USG rate must be paid by the traveler.

Rates for National Travel outside the region of the traveler's home base in a foreign country: The field office should establish per diem rates based on U.S. Embassy in-country rates and review them at least annually to ascertain if adjustments are needed.

Lodging

The amount of reimbursement for lodging is either the actual hotel rate per day *or* the per diem amount (USG maximum lodging amount),*whichever is less*. An original itemized hotel bill must be supplied as documentation for the expense *in either case*. Non-reimbursable items (e.g., movies, mini-bar alcoholic beverages) must be subtracted by the traveler before submitting the TBER.

When travel will be covered by USG-sourced funds, the traveler should ask for the USG rate when booking a room and explain that he/she is conducting business with the U.S. government in coordination with local partners. (See Appendix 47 of the ICAP SOPs for a sample letter.)

Lodging costs exceeding the per diem rate will only be reimbursed in extraordinary circumstances. The employee must submit with the TBER aPolicy Exception or Adjustment Request explaining the extenuating circumstances. This memo will be approved by the Columbia University Mailman School Dean's Office if the exception is deemed justifiable.

Note: Lodging receipts must be attached, whether or not the lodging per diem is paid.

Meals and Incidentals

The Meals and Incidentals Expense (M&IE) allowance is a daily allowance intended to cover meals, tips, and other small costs, including laundry. No receipts are required to claim the M&IE allowance. Any additional amount spent above the per diem is at the expense of the employee and will not be reimbursed.

If claiming the M&IE allowance, the traveler must select per diems for the duration of the trip (i.e., the traveler cannot alternate between per diem and actual receipts).

For differing lengths of travel time, the M&IE allowance should be calculated as follows:

- Travel under 12 hours is *not eligible* for M&IE

- If travel is more than 12 hours but less than 24 hours, the allowance is 75% of the applicable M&IE per diem rate

- When travel is 24 hours or more, the M&IE per diem is 75% on the day of departure and 75% on the day of return

Other Travel Allowances

Fares for Ground Transportation

Taxi fares to and from airports and where public transportation is not practical will be reimbursed. This policy includes transportation between hotels, railroad stations, airports, and meetings.

Taxi fares for travel to and from the field office that the traveler is visiting are reimbursable. Taxi fares for personal purposes (including for the purpose of obtaining meals) are not reimbursable.

Fares for employee's travel to and from the field office where they work are generally not reimbursable.

Immunizations

All staff who are traveling should try to obtain immunizations at no or low cost through their existing health plans or Columbia University Medical Center. However, if not available, immunizations may be obtained elsewhere. In all cases, the expenses are reimbursable.

Travelers should refer to the CDC website for the appropriate vaccinations. It is the employee's responsibility to monitor his/her own vaccination status.

For those departing from New York City, there are multiple clinics that assist with medical requirements for international travel. The Columbia's Health Services site has information on NY clinic locations. Travelers may also contact the Interchurch Center or Travel Health Services or call 212-734-3000.

Expense Reporting

Each expense must be necessary and reasonable to be reimbursable, meaning that it must have a clear business purpose and not be excessive.

Employees are required to use the *Travel and Business Expense Report* form to obtain reimbursement for travel-related expenses. Since TBERs may be used as well for non-travel expenses, it is important to check the "Travel Expenses" box at the top of the form as opposed to the "Business Expenses" box.

The TBER form and instructions for completion may be found on the University site, and further details may be found in the full text of Columbia University's Travel Expense Policy.

Select from one of the following topics in the pulldown menu to learn more about the processes involved in expense reporting.

Documentation

Documentation required for travel is as follows:

- **Tickets:** The traveler must attach the original airline ticket receipt or print-out of the electronic ticket statement, proof of payment in cases where the traveler him/herself paid for the ticket, and boarding passes (copies or originals). The original passenger ticket or e-ticket statement *must include the dates and points of departure and arrival, the travel "class," and the total cost of the ticket.* If a U.S. carrier was not used and expenses will be charged to a USG grant or contract, the traveler must attach the required documentation (see Air Travel).

- **Lodging:** The traveler must submit the official lodging receipts.

- **Other Expenses:** For reimbursement of other expenses, the traveler should include them only if they are travel-related. If the expenses are not for travel, but for business, e.g., supplies and materials, these must be reported on a separate TBER, at the top of which the traveler has checked the "Business Expenses" box instead of the "Travel Expenses" box.

- **Meeting/Workshop Expenses:** The traveler must attach documentation about the meeting/workshop (purpose, agenda, and list of attendees with individual signatures acknowledging receipt of funds).

Business Purposes

The description of the overall business purpose of the travel and the business purpose of each expense reported must have a certain level of detail to meet auditing requirements. For example, a description such as "working lunch" or "conference attendance" is inadequate. The level of detail required is shown in the following examples:

- Business lunch in Stamford, CT, to discuss with Foundation XX the possibility of their funding an expansion of our Maternal Health Project from Bangladesh into Nepal. Attendees: XX of Mailman School, XX of Mailman School, XX of Foundation XX, and XX of potential Partner Organization XX.

- Attendance at the annual American Public Health Association conference on "Public Health without Borders," held in Boston, MA, from October 25-29, 2008 (see attached brochure). Paper presented on maternal health care in Nepal.

Lost Proof of Payment and Exception Policy

If a request for reimbursement does not conform to stated Columbia University policies, or if a receipt is lost or proof of payment is otherwise not clearly documented, the traveler must submit a Policy Exception or Adjustment Request. The memo should clearly explain why this exception is warranted and, for missing proof of payment, provide the date of the expense, specific details of the expense (for example, the name and address of the hotel), and the amount. The PI or his/her supervisor must approve the exception.

See the relevant Accounts Payable policies.

Conversion Rates

The TBER instructions allow for handling currency conversion by using an average daily rate for the travel time period or by using an actual rate for each line-item expense. The instructions cover how to do the calculations using rates from www.oanda.com and apply them in reporting travel expenses.

Travel Advances

Travel advances are cleared through the submission of the TBER, with the traveler submitting a personal check for any advanced funds that were not used.

Reimbursement Submission Time Limit

- Employees should submit the TBER within 10 business days of a trip (for travel) or bi-monthly/monthly (for business expenses).

- Employees *must* submit requests for reimbursement to their department *within 120 days* from the date the expenses were incurred,*or* the end of the University's fiscal year on June 30th, whichever comes first.

Vehicle Usage

Whether the project leases or owns vehicles, the field office must have procedures for authorizing drivers, keeping vehicle logs, conducting maintenance, handling expenses, dealing with traffic violations, and allowing personal use of project vehicles. A good starting point in drafting these procedures is Section 7: Travel in the ICAP SOPs.

Unless circumstances mandate otherwise, all vehicles purchased or leased for local use by the director of the field operation and other authorized operators must be titled and registered in the name of the local University business entity (usually a limited liability company - LLC).

Insurance

The project must have comprehensive insurance coverage for all University-owned motor vehicles, in compliance with local regulations and ordinances where the vehicle will be registered and/or garaged. At a minimum, each vehicle must be insured for liabilities associated with injuries to persons and property in an amount that is reasonable and customary for the local country in which the vehicle is registered.

Only authorized persons should be permitted to use the vehicle, and then such use must be restricted to the furtherance of University business.

If a University-owned project vehicle is stolen or suffers damage in an accident, the field office must report the loss to the New York office, even if the local insurance policy may cover the loss. If the local insurance company provides compensation for the loss, these funds may not be spent without NY approval.

Note that these procedures apply only to vehicles owned by the University and not by a local entity or an individual. Vehicles owned by the local entity shall promptly report all accidents or losses to their local insurance company.

If contemplating using a personal vehicle for Columbia University work, the PI or Country/Project Director should consult the Department Administrator for guidance.

Consultants

Each consultant should be given a copy of the relevant travel guidelines when beginning to make plans for travel. The travel guidelines for international consultants that were developed for the ICAP SOPs may be edited for use in other international projects. They may be found in Appendix 21 of the ICAP SOPs.

An international project that hires local consultants on site should have a similar set of travel guidelines to provide to them.

Expatriates

Expatriates are entitled to travel allowances associated with home leave and evacuation for medical or security reasons. For full details about home leave, see *Policies and Procedures for Expatriate Allowances* (available from the ICAP Director of Human Resources).

When traveling abroad, all Mailman School employees are covered by Emergency Security and Medical Evacuation Insurance, which is called SOS. For further information, employees may contact the Department Administrator.

Note that consultation with ICAP on this particular topic is not a good idea, as ICAP's SOS program differs from the University's master SOS program, which covers all other international projects.

Human Resources

The arrangements for human resources management of international operations vary significantly from project to project, depending on the project's goals and its implementation approach.

Some Mailman School international programs have a full complement of local staff in the country of operation, while small projects may have no staff at all. However, even a small project hiring one local consultant must pay some attention to human resources management.

The following checklist, drawn from the ICAP SOPs' lengthy section on this subject, serves as a management tool for implementing the essential elements of human resources management in major, ongoing field operations. PIs and Country/Project Directors leading smaller operations are advised to review the checklist, select those elements that apply in their context, and make their own list to guide project staff who are responsible in any way for human resources management.

Recruitment and Hiring

For more information on this topic, see Hiring Staff & Consultants.

- For all staff recruitment, before hiring a person, create a new or updated job description and obtain approval to hire
- Ensure all recruitment activities are consistent with Columbia University's commitment to the principle of equal employment opportunity
- Prior to their traveling to Columbia University or another location for interviews, advise all candidates whether or not their travel expenses will be reimbursed
- Perform reference checks on all prospective employees and document them (see the University's Reference Check Form)
- In the case of a local hire, provide the new employee with a letter of employment, have him/her counter-sign it, and retain a copy in the project's records
- Contact all candidates that were interviewed but not chosen for the job and inform them that they have not been selected

Compensation and Benefits

- Compensate local staff in accordance with the U.S. Embassy's Local Compensation Plan, which includes the Foreign Service National (FSN) scale
- Provide personnel benefits in accordance with local law and practice and as documented in the Local Hire Manual
- At the beginning of each Columbia University fiscal year, disseminate a memo with a list of holidays that the local field office will observe that year

Working Conditions

- Ensure that all locally hired employees submit completed, signed Monthly Time and Effort Sheets to their supervisors for review, verification, and approval (see Appendix 22 of the ICAP SOPs for a timesheet template that could be adapted)
- Ensure that on a monthly basis, all expatriate (NY-hired) employees update their Time/Attendance Report, obtain supervisor sign-off, and submit it to New York
- When planning to be absent, communicate to relevant parties the expected length of absence, contact information, who is providing coverage, and what specific authorities have been delegated, if any
- Ensure that the primary supervisor of every new employee orients him/her fully to his/her new job and working environment
- For staff development opportunities for project staff, submit a proposal for review and approval by the PI, if the opportunity is related to a grant, and otherwise to the Department Administrator

Other Human Resources

For more information see the Local Hire Manuals and Human Resources Records.

- For local hires, conduct performance appraisals at least once per year according to a regular schedule established by the University and documented in the *Local Hire Manual*
- Hold an interview with each departing employee and complete an Exit Interview Report (adapted as required for local hires)

- For all terminating or transferring employees, complete an Exit/Termination Checklist (adapted as required for local hires) and ensure all accounts are settled and property returned in good order before issuing the final payment to the employee

- Take precautionary measures to enhance staff security/safety and reduce risks in areas such as criminal activity, travel accidents, and civil unrest

- Prior to putting out the *Local Hire Manual* or publishing major changes, have local legal counsel and then the Department Administrator conduct a review

- Maintain a complete, confidential personnel file on each staff member and keep the files in a secure location

Hiring Staff & Consultants

Staff

Country registration is usually needed before Columbia University may hire staff in a foreign country. See Country Registration and Agreements for more information.

Prior to obtaining country registration, local hiring may be done through consultancy agreements. International projects may operate without any local staff at all, but may require contracting international and/or local consultants.

Consultant

A consultant or independent contractor is an individual retained by Columbia University for his or her specialized technical, program, or administrative expertise to work on a fee-for-service basis.

Consultants are hired for a specific task and specific duration. For legal reasons, they must not be confused with staff, e.g., they must not be charged with performing duties within an established job classification, nor may they supervise staff. Nor should consultants be confused with individuals providing expertise through an arrangement between Columbia University and another entity; these are employees of the subgrantee or subcontractor agency.

The terms of the consultancy must be defined in the consultant services agreement, with distinction given to international consultants. Consultants are not entitled to benefits.

Contracting Consultants

The basic guidelines for contracting consultants are as follows:

- Only hire consultants for short-term assignments documented by an agreement and Scope of Work (SOW)

- Have consultancies approved by the funding agency and/or appropriate host-country government when required

- For international consultancies, reference the procedures for hiring a consultant and obtain three quotes or complete a Sole/Single Source Justification Form (available in Appendix 17 of the ICAP SOPs)

- Have all consultants sign a consultant agreement in the required format

- For consultants with a contract valued at $50,000 or greater, have the consultant acquire liability insurance prior to commencing work

- Provide consultants with the relevant travel guidelines (seeConsultants)

Types of Consultants

The contracting process differs for the three categories of consultants:

- **A local consultant** is a resident in the country where Columbia University is operating and is not a U.S. citizen or U.S. permanent resident. He/she is paid from the field office.

- **A non-U.S. international consultant** is not a U.S. citizen or U.S. permanent resident, but is contracted by and paid from Columbia University in New York as a third-country national.
- **A U.S. international consultant** is a U.S. citizen or U.S. permanent resident – as identified by their having a Social Security number – who may currently reside in the United States, or in the country where Columbia University is operating, or in a third country.

Contracting Local Consultants

The work entailed in many international projects is better suited to contracting local consultants rather than hiring long-term local staff. Even if intending to hire local staff, an international project may initially contract people as consultants until such time as the University's country registration or other legal arrangements are in place.

Local consultants are paid directly by the field office at a rate determined in accordance with prevailing local rates for similar work. Any deviation from these rates, whether higher or lower, should be justified in writing and approved (signed off) by the PI or Country/Project Director.

In advance of the consultancy, the PI or Country/Project Director and consultant must sign a Consultant Letter detailing the consultant's Scope of Work and specifying the maximum number of approved days and daily rate of pay. See Appendix 13 of the ICAP SOPs for a template of a Local Consultant Letter.

Contracting International Consultants

All international consultants are paid out of the New York office. Staff working with the international project must take the following steps:

- Prepare an SOW that specifies the tasks, the budget, and the length of the consultancy (see Purchasing for the SOW form that must be used, as well as for all the other required consultant forms)
- Identify and select the consultant
- Obtain prior salary history from the consultant to justify his/her daily rate (if USAID funds, have the consultant complete a Contractor Employee

Biographical Data Sheet - Form AID 1420-17

- Use the University's "Interactive Form Selector" to choose the correct consultancy contract
- Through the "Interactive Form Selector," follow the step-by-step instructions, which indicate the documents that must be submitted with the requisition to the Purchasing Office.

Note that in certain cases, a completed Sole/Single Source Justification Form (see Appendix 17 of the ICAP SOPs) for a sole-source procurement is required. Also, certain consultancies require evidence that the consultant has a current insurance certificate with required general liability, automobile liability, professional liability, and/or workers compensation coverage.

- Maintain copies of the justification form, if any, in the purchase order (PO) files
- Complete CU Purchasing Department requirements, including obtaining approvals from Mailman School's Business Office
- Review funding agency information and obtain funding agency approval when required
- Maintain consultancy records

Additional information on consultants may be found in the University's Consultant Policy.

Local Hire Manual

Every international project with more than a few long-term staff members should have a *Local Hire Manual*, the primary purpose of which is to document additional policies and standard operating procedures that enable local operations and ensure adherence to local laws, especially those pertaining to employment.

In most cases, the *Local Hire Manual* is the basic policy document that states the rights and responsibilities of the employer and defines the relationship between the employee and the employer.

See the ICAP SOPs for guidance on what content might be included in this manual, how to keep the manual current, and when to translate it into the local language. Most Mailman School international operations will not require such extensive *Local Hire Manuals* as those used in ICAP operations.

In addition, many will not have the same level and type of employment benefits. Therefore, the PI and Country/Project Director should use their judgment in determining:

1. what employment benefits and working conditions to provide for staff, and

2. what *at a minimum* must be documented to manage risk associated with local operations and locally hired personnel.

All local-hire employees should be given access to a copy of the *Local Hire Manual* when hired and should acknowledge receipt of the same.

Expatriate employees should be given a copy of the *Local Hire Manual* upon initiation of work in country. Even though the Local Hire Manual is not relevant for defining the relationship between expatriates and Columbia University, it is relevant for interaction with and supervision of local-hire employees and for expatriates' adherence to field office procedures in areas such as security plans, absences and late arrivals, and computer back-up measures.

Note that the *Local Hire Manual* should not supplant this International Projects Manual, but should be a complementary project resource.

Legal Review

The *Local Hire Manual* must be reviewed by local legal counsel when first drafted and a written opinion obtained and kept on file. When manual sections are updated with significant change to the content, this process must be repeated to ensure ongoing compliance with local law.

Departmental Review

Once the legal review is complete in country, the PI or Country/Project Director should submit the *Local Hire Manual* with the counsel's written opinion to the Department Administrator for review.

Records

Maintaining complete and up-to-date human resources records is important for efficient operations, effective human resources management, documentation in the case of grievances or legal cases, and meeting funding agencies' record-keeping requirements. (For more information, see record retention requirements.)

A confidential personnel file on each staff member should be maintained. This file should include, but not be limited to, copies of the following:

- Job description

- Employment contract or hire letter, signed by both the employee and the University representative

- Acceptance of receipt of the Local Hire Manual, where applicable

- Curriculum vitae with photo

- Certificates and testimonials

- Identity Number

- Emergency contact information

- Dependent information (list of names, relationship, dates of birth), supported by corresponding marriage and birth certificates, where applicable

- Key correspondence

- Performance appraisals

- Written reprimands

All personnel files should be kept in a secure location and access strictly controlled.

Subaward Management

University Policy

The University has a *Policy on Sponsored Project Subawards*, which is frequently referenced in this section on subaward management. The*Policy on Sponsored Project Subawards* seeks to:

- Ensure that risks associated with a subaward or a subrecipient are identified and managed prior to the grant of a subaward

- Promote compliance with U.S. government (USG), state, and local laws relating to subrecipient monitoring

- Assign appropriate unit-level and individual responsibility and accountability for the establishment and management of subawards

- Ensure that a funding agency's funds are appropriately spent and that the University and its funding agencies receive value for funds expended

This section not only covers the policy's salient points, but also offers supplemental procedures to facilitate fulfillment of the policy's stated goals in the implementation of subawards in international projects.

Mechanisms and Players

A subaward is an award of financial assistance, in the form of money or property in lieu of money, made by Columbia University to a collaborator. In this scenario, Columbia University is the recipient of an award in connection with which the University establishes a subaward to facilitate performance of and payment for specific work to be conducted by a subrecipient.

Agreements relating to subawards may also be called subcontracts, subagreements, subgrants, consortium agreements, purchase orders, purchase service agreements, or trial protocol agreements.

A collaborating agency, whether a university, an international agency, or a local organization in another country, is referred to as a subrecipient, or more specifically a subgrantee or subcontractor.

A subaward may be made by the University as a recipient of a primary award or as the subrecipient of another institution's primary award.

Subawards must conform to USG and state laws and the restrictions placed by the funding agency upon the primary award, whether a grant, cooperative agreement, or contract. That is, subrecipients must comply with all *flow-down provisions* from the prime award that apply as well through the subaward mechanism. Columbia University is responsible for monitoring subrecipients for compliance with all funding agency regulations and grant/contract conditions.

For more detail, see the University's Policy on Sponsored Project Subawardsand the relevant USG circulars referenced in that policy.

Responsibilities

Primary Investigator Responsibilities

When the University assigns responsibilities to a subrecipient through a subaward, the University remains responsible to the funding agency for managing funds and meeting performance goals. As such, the principal investigator (PI) is required to exercise proper oversight over the technical (programmatic), financial, and administrative activities of each subaward.

Although the PI may delegate responsibility for day-to-day subaward management to others, most notably to a Country Director or Project Director in the field location, the PI must exercise appropriate oversight to ensure that all University and funding agency requirements are met.

The PI's responsibilities include:

- Identify and assess potential subrecipients

- Advise subrecipients of applicable USG laws and regulations, and appropriate flow-down provisions from the prime award

- Provide technical support to subrecipients in program administration, financial monitoring, and contractual management as needed

- Conduct financial and programmatic monitoring, including receipt and timely review of reports and, where appropriate, site visits

- Ensure subrecipient compliance with all Columbia University and subaward policies and regulations

- Take appropriate action in cases of recurrent non-compliance with subaward terms and conditions

These responsibilities and more are covered in the checklist on essential elements of subaward management in Essential Check-List.

Responsibilities in New York

Subaward responsibilities in New York are defined in the University's Policy on the Sponsored Project Subawards. The policy stipulates that:

- The preparation and negotiation of subawards other than clinical trials conducted at Columbia University Medical Center (CUMC) are the responsibilities of the Office of Research Administration

- The preparation and negotiation of subawards for clinical trials are the responsibilities of the Clinical Trials Office (CTO)

- The Office of Research Administration (RA) is responsible for the final approval and execution of all subaward agreements/contracts and for initiating all procurement actions needed to encumber the University financial systems

Establishing a Subaward

The University's Policy on Sponsored Project Subawards provides specific procedures that must be followed *prior to submission of an application for funding* that includes subawards.

The procedures differ for non-clinical trial subawards and clinical trial subawards. In all cases, however, a funding proposal with subawards may only be submitted once all of the required documentation has been received by RA or the CTO.

The University's policy also lays out the procedures for *preparation and execution of subawards* following receipt of a notice of award. PIs should be familiar with the procedures and diligent in collaborating throughout the process with RA and, where applicable, the CTO.

Essential Check-List

The arrangements for subaward management in international operations vary from project to project, depending on the scale and risk associated with the project. Generally, however, subaward management is complex and requires robust administrative and financial systems.

The following checklist is a management tool for implementing the essential elements of subaward and subrecipient management in higher-risk operations. PIs and Country/Project Directors may select from the checklist those elements that apply in their context and make their own list to guide staff engaged in subaward management. In ICAP SOPs, the reader is referred to an extensive resource for subaward management.

Responsibilities

- Name one or more Columbia University staff members explicitly as the liaisons between the University and the subrecipient organization, with clearly defined responsibilities in the areas of both financial and technical oversight

- Maintain electronic and physical records of all documentation and communications pertaining to each subaward, and follow Columbia University's and the funding agency's record retention policy

New Subawards

- Collaborate with the Department Administrator and RA and, where applicable, the CTO when making arrangements for any new subaward, providing them with copies of the statement of work (also known as the Scope of Work - SOW), budget, budget justification, and other documentation specified in Appendix A to the University'sPolicy on Sponsored Project Subawards

- Establish subawards for periods no longer than one year, renewable for additional periods as appropriate

- Confirm that prospective subrecipients are not among debarred vendors listed on the "Excluded Parties List System"

- Obtain certification from a subrecipient that it has not and will not support terrorist acts (see Vendor Restrictions and Debarment)

- For renovation subawards, issue invitations for bids (IFBs) when there is reasonable expectation of more than one qualified bidder

- Complete a *Sole/Single Source Justification Form* (available in Appendix 17 of the ICAP SOPs) in the case of non-competitive procurements

- Conduct a risk assessment before executing a Risk Assessment Subaward (see the University's Policy on Sponsored Project Subawards for the definition and procedure)

- For all other subawards, conduct an on-site pre-award assessment of each potential subrecipient (for more extensive assessments, consider using the *Subrecipient Assessment Form* in Appendix 63 of theICAP SOPs)

- Have an authorized official of the subrecipient organization sign final versions of SOWs and budgets to indicate their concurrence with the contents

- Collect complete and accurate contact and bank account information for each prospective subrecipient

- Work with the Department Administrator and RA or the CTO to obtain funding-agency approval for new subawards or major changes to existing ones, including no-cost extensions (NCEs) and cost extensions (continuations)

Subaward Execution and Payment

- Take into account that from the time the documentation for a new subaward or subaward amendment is submitted to New York until the time a payment is issued to the subrecipient typically takes two to three months, and plan accordingly

- Inform subrecipients that Columbia University requires formal notification of any change in bank accounts (e.g., opening and closing accounts, replacement or new signatories on the account, and revised bank information that is required for wire transfers)

- Wait to process advance requests until the PI or Country/Project Director has in hand the expenditure and technical reports required from the subrecipient

Post-Award Management

- Provide subrecipients with training in subaward management at the initiation of that agency's first subaward

- Review all subrecipient invoices or expense reports, comparing them to the subaward budget and disallowing unreasonable, unallowable, or unallocable costs (see specific requirements in Appendix D to the University's Policy on Sponsored Project Subawards)

- Sign-off on all invoices and expense reports, and retain copies in the department/center files (see specific requirements in Appendix D to the University's Policy on Sponsored Project Subawards)

- As necessary to evaluate subaward implementation, visit subrecipients' project sites regularly to monitor program performance, provide technical assistance, ensure subrecipient conformance with their SOWs, and ensure awarded funds are used for authorized purposes

- Document technical and financial visits to subrecipients (consider using the ICAP SOPs' forms for Site Visit Reports)

- Through the Department Administrator and RA or the CTO, obtain funding agency approval prior to the subrecipients' making expenditures for restricted items (e.g., in the case of USG funding, expenditures for building alterations and renovations, subawards to other organizations, consultants, international travel, and vehicles and other major equipment)

- Require that, where applicable, subrecipients maintain a property log and submit it on an annual basis with the final expenditure report

- Require subrecipients to submit effort-reporting certifications, documenting work on University-funded activities

- Notify the Department Administrator and RA or the CTO of any developments that have a significant impact on the activities supported by the subaward, including any problems, delays, or adverse conditions that may materially impair the subrecipient's ability to meet the objectives identified in the subaward SOW

Subaward Extensions and Close-Out

- Notify the subrecipient 30 days prior to the expiration of a subaward and, as appropriate, facilitate their requesting a no-cost extension (NCE) or cost extension (continuations)

- Send a close-out letter to the subrecipient 30 days prior to the end date of a subaward, if it has been determined that the subaward will not be extended

- Formally close out the subaward within 60 days of the conclusion of the period of performance, unless RA or the CTO grants an extension of time (see specific requirements in Appendix F to the University'sPolicy on Sponsored Project Subawards)

ICAP SOPs

Mailman School's International Center for AIDS Care and Treatment Programs (ICAP) conducts programs extensively through subrecipient organizations and has comprehensive standard operating procedures (ICAP SOPs) for subaward management. These standard operating procedures are a good resource for other Mailman School international programs and projects that are giving subawards.

PIs and Country/Project Directors should adapt and adopt them as appropriate for the size and nature of their international project and in accordance with proper risk management.

While the ICAP SOPs are written explicitly for subawards made with USG funding, most of the material applies as well to subawards made with resources from non-USG sources.

The ICAP SOPs cover:

- Field office requirements and responsibilities

- Subaward initiation

- Pre-award requirements, including risk assessments

- Subaward development, including SOWs and budgets

- Special procedures for subawards for building renovations

- Funding agency approval of subawards

- Execution of subawards and payment

- Post-award management, including monitoring of compliance, financial oversight, training, and technical support

- Subaward amendments

- Subaward audits

- Close-out and termination of subawards

In addition, the ICAP SOPs have numerous appendices to support management of subawards, such as a **Subrecipient Assessment Form**, **Subrecipient SOW Template**, **Subrecipient Financial Site Visit Report Form**, and **Subrecipient Close-Out Letter Template**.

ICAP also has Guidelines for ICAP Subrecipients, which they provide to their subrecipient organizations and which may be useful when adapted for other international projects.

Vendor Restrictions and Debarment

Subawards with certain debarred or suspended vendors are restricted by the U.S. government's Executive Orders 12549 and 12689, "Debarment and Suspension", 22 CFR Part 208. If using USG funds for the international project, the PI or his/her designee

must confirm that prospective subrecipients are not among debarred vendors listed on the"Excluded Parties List System". A notation of this confirmation should be made in the project records.

USG regulations also require Columbia University to obtain certification from a subrecipient that they have not and will not support terrorist acts. The University will not fund an entity that does not meet these qualifications or that refuses to sign the certification.

The signed certification should be collected at the time the subaward document is signed by an authorized official of the recipient agency. (See the *Subrecipient Certification Regarding Terrorist Financing* form, available in Appendix 70 of the ICAP SOPs.)

In addition to ensuring that subrecipients sign and submit the certification, the PI or his/her designee must also confirm that the prospective subrecipient is not on the master list of "Specially Designated Nationals and Blocked Persons" (maintained by the U.S. Treasury's Office of Foreign Assets Control – OFAC) and the United Nations Security Council Resolution 1267 list. A notation of this confirmation should be made in the project records.

Definitions

Subgrants and Subcontracts

Awards received by the University through a lead organization that has received an award from a funding agency. Known collectively as*subawards*, they describe the relationship that exists between the primary contractee or grantee and a secondary investigator and institution on a project.

A subaward is used when substantive programmatic work and intellectual input will be provided by a secondary or cooperating institution. The general structure of a subaward is similar to that of an award in the form of a grant or contract, except that the relationship is between the primary and secondary institutions and not between the primary institution and the awarding agency.

In general, any restrictions or conditions applicable to the primary institution are "passed along" via the subgrant or subcontract to the secondary institution. Additional restrictions or conditions can also be imposed.

Subcontractor

The legal entity to which a subcontract is awarded and which is accountable to the contractee.

Subgrantee

The legal entity to which a subgrant is awarded and which is accountable to the grantee.

Subrecipient

The legal entity to which a subaward is made and which is accountable to the recipient for the use of the funds provided.

Close-Out

Planning for close-out is important especially in the case where an international project has had any level of ongoing field operations. The aim is to ensure that all aspects are handled in ways that are legal, respectful, and most supportive of ongoing efforts in international health.

In the most positive situations, close-out is the natural conclusion to a project that has successfully achieved its programmatic and financial objectives. PIs and Country/Project Directors should therefore integrate "exit strategies" into project design and implementation.

The process should involve close collaboration with partner organizations in all stages of the process.

Where project activities will continue, the PI and/or Country/Project Director should carefully plan how and when to transfer responsibility for their implementation to other entities.

One of the most difficult aspects of close-out is the impact on locally hired employees. Well before the close-out date, the PI and Country/Project Director should work with the Department Administrator and local legal counsel on the plan for the transfer and termination of staff.

The close-out must be carefully coordinated with the following offices of the University:

- General Counsel
- Restricted Funds

- Human Resources

- Research Administration

- Treasurer

Responsibilities

The Principal Investigator is responsible for programmatic and operational close-out of the international project activity, including submission of all technical reports required by the funding agency, closure of bank accounts and petty cash funds, reconciliation of travel advances, termination of services and contracts, and close-out of subawards.

For financial close-out, the PI must:

- Provide accurate and timely financial reconciliations on which to base the financial reports required for close-out

- Ensure that the indirect costs reported to the funding agency are calculated at the proper rate

- Make any charges and/or adjustments necessary in a timely and accurate manner to ensure that the expenditures reflected on financial reports agree with those recorded in the University's accounting records

In addition, the PI must ensure that following the end-date of the award, the account(s) in the accounting system are closed. The PI must work in concert with the Office of the Controller and, in particular, with Restricted Funds to close both advance accounts and FAS sponsored/restricted accounts.

A sponsored/restricted account may be closed out when the account is in balance, i.e., when project-to-date expenses on the University's Financial Accounting Systems (FAS) agree with the total amount of expenditures on the Financial Status Report (FSR) submitted to the funding agency.

The Restricted Funds Division of the Office of the Controller is generally responsible for financial reporting at close-out. U.S. government regulations require that FSRs be submitted within 90 calendar days following the expiration of either the budget year of the project, or more commonly, following the expiration of a competitive segment of the award.

For other funding agencies, reporting deadlines vary and are dictated by the policies of those agencies or stated terms and conditions of the award.

For more details, see the University's Policy on Financial Reporting and Closeout of Sponsored Projects. See also Reporting to Funders.

Plan

In the case of international projects that have had major ongoing operations, a written plan should be drafted for the close-out process to ensure that all aspects are handled in optimal ways. The plan should include:

1. Introduction – The overall timeframe for the close-out and a summary of the management plan

2. Programs – The strategy for phasing out or over each major activity that the field office has

3. Personnel – Specifics about how and when staff will be laid off or transitioned to partner organizations or transferred to other projects; proposed special benefits or compensation

4. Finance – Timing for paying all outstanding expenses, closing bank accounts, terminating services and contracts, and conducting a final audit, if necessary

5. Grants/Contracts – Details on closing out grants/contracts, especially if close-out will occur prior to the end-date of existing grants, cooperative agreements, or contracts

6. Subawards – Details on closing out subawards, including how and when subrecipients will be notified and how they will be supported through the close-out process

7. Operations – Descriptions of any major operational issues for which planning is important

The table in the Activities section provides a listing of some of the required activities and may form the basis of a close-out workplan.

Activities

The following may serve as a useful checklist for closing out international projects. The PI and Country/Project Director should look at each activity and specify who is responsible for taking any required actions and in what timeframe. Note that the items are not in chronological order.

Sample List of Close-Out Activities

Program

1. Explain the close-out plan to community, subrecipients, other partner organizations, and, where appropriate, funding agencies
2. Identify final project commitments
3. Purchase and distribute final project materials
4. Arrange final training activities
5. Conduct final closure meetings
6. Pay all bills in project sites and close satellite offices
7. Consolidate and send to New York all program records; destroy all records that do not need to be retained (see the funding agency's record retention regulations)

Representation

1. Notify ministries, NGOs, in-country representatives of funding agencies, and other partners
2. Invite New York staff to assist in close-out
3. Publicize results of program activities

Personnel

1. Give adequate notice to staff and inform them of the timetable for close-out 2. Make a special effort to maintain staff morale
2. Use "stay bonuses" if necessary
3. Provide career counseling for staff
4. Pay all outstanding compensation due
5. Have each staff member sign a receipt stating that all payments by the local entity/Columbia University are completed
6. End all staff and consultant contracts
7. Prepare letters of recommendation
8. Deregister international staff with the police/embassy
9. Consolidate and send to New York all personnel records; destroy all records that do not need to be retained (see the funding agency's record retention regulations)

Finance

1. Discuss the closure plan with bank representatives
2. Plan and pay all outstanding project expenses one month prior to close-out
3. Monitor expenses and review them every 2 weeks during the final close-out period
4. Plan basic expenses for the final month
5. Close all field office services, leases, contracts, etc. (if signed in New York, have Columbia University terminate them)

6. Close bank accounts and coordinate with the Department Administrator on the disposition of funds

7. Conduct a final audit, if necessary

8. Consolidate and send to New York all financial and administrative records; destroy all records that do not need to be retained (see the funding agency's record retention regulations)

Grants/Contracts

1. Inform funding agencies of close-out plans and rework program plans if required

2. Charge grants/contracts for all allowable costs, including evaluations, audits, severance, and expatriate relocation

3. Provide funding agencies with final reports

4. Follow funding agency requirements for grant/contract closure

Subawards

1. Inform subrecipients of general close-out plans and provide a timetable for subgrant/subcontract close-out

2. Obtain final financial and narrative reports from subrecipients

3. Arrange final payments to subrecipients, or arrange for any balance of funds to be returned to New York

4. Follow University procedures for subgrant/subcontract closure

Operations

1. Obtain approval for planned disposition of major (capital) equipment

2. Inventory all assets and distribute/sell them

3. Inventory all project materials and distribute or donate them

4. Provide notice on leases

5. Close accounts with utilities providers

6. Identify who receives mail after the operation is closed