

# Northeastern University

Office of Research Administration and Finance

Jeff Seo, Assistant Vice  
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Compliance



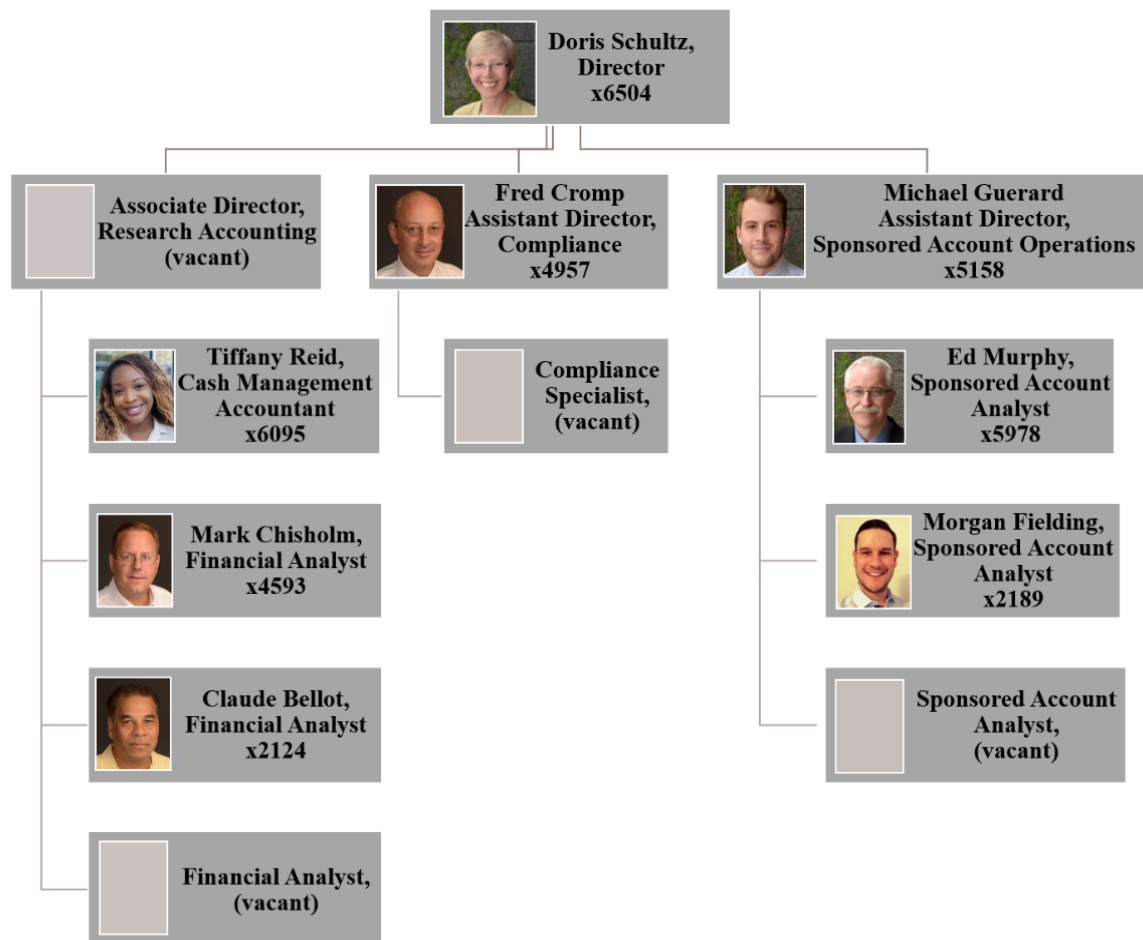
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Meet Jeff Seo. He is responsible for NSF Award Compliance Program operations, including review of awards development of training programs, and submission of comprehensive written annual reports to NSF OIG on the status of compliance under the NSF Award Compliance Program. The Compliance Officer shall monitor Northeastern's internal controls for compliance with all applicable laws and regulations regards the use and expenditures of NSF award funds.

## Research Finance and Compliance Newsletter March 2017

The Office of Research Finance manages the post-award activities of Northeastern University's research enterprise and other sponsored activities to ensure financial compliance with applicable federal, state, and local laws as well as sponsor regulations. The University receives over \$110 million annually in revenues from various government agencies and private sources for sponsored programs.

### The Research Finance Team



## Compliance Corner

### The Uniform Guidance Revisited

When first proposed the Uniform Guidance (2 CFR 200) (the “UG”) was a source of anxiety for most recipients of federal awards as it represented the single most comprehensive update of the OMB Circulars governing the management and oversight of research funds. The UG naturally caused grantees to assess gaps and update their policies and procedures for consistency prior to the December 26, 2014 effective date. Beyond incorporating the new citations under the UG into internal policies, many sought to strengthen their processes around subrecipient risk assessment and monitoring; to identify and memorialize post award internal controls; and to tune and refine training and education materials, among others. If anything, the UG caused internal stakeholders to thoughtfully and objectively review the internal operations of its research enterprise. It also caused representatives from Pre-, Post-, Finance, Compliance, and Procurement to collaborate and subsequently reinforced effective lines of communication amongst the internal teams.

Despite the opportunity the UG provides in stimulating internal enhancements and improvements, much is still unclear under the UG. For example, the effective date for the procurement standards under the UG remain delayed (at least until July 2017 or longer) while academic and clinical research institutions develop policies and procedures around Micro Purchases (less than \$3500) and Sole Source Purchases (also known as Non-Competitive Purchases) two of the five methods of procurement identified under the UG. In particular, the threshold for Micro Purchases represents an adjustment for most grantees as we have become accustomed to a higher threshold for (usually \$5K or 10K). Further, few had existing guidelines related to conflicts of interest or other standards related to procurements funded by federal grants. As such, we should expect progress on this front including models in which sole source justifications are scrutinized internally.

It is still too early to determine the full effect of the UG, but programmatic changes thus far can be described as subtle. Sponsor audits and federal enforcement activity still apply the standards from the old Circulars, and realistically, federal audits of grants awarded after the Effective Date may not take place for another few years. However, this is not the time for federal grantees to become comfortable or satisfied. One of the main tenets of the UG was to serve as a means to reduce fraud, waste and abuse of government spending. While in some ways, the UG is less prescriptive than the guidance under the Circulars, consequently the UG is also entrusting grantees to develop and enforce their own procedures that are consistent with the spirit of the UG. Audits will seek grantees’ policies and procedures, contrast them to the UG, and test them against the expenditures made against certain awards. If anything, the expectations of grantees are quite high under the UG.

Northeastern University is in the midst of an exciting era where research is being highlighted and emphasized. As stewards of a growing portfolio of federal research grants, we are expected to develop and adhere to reasonable processes that help ensure the integrity of research. I invite you to be a part of the process and to make your voice heard as we grow together in developing a research compliance program that works for all of us. I firmly believe in the mantra “as we develop each other, we develop ourselves.” We will start by developing and maintaining effective lines of communication, and providing additional opportunities to raise awareness across our research community. Each of us has something to contribute towards this endeavor, and I warmly and sincerely invite you to play a role no matter how small or great.

### Spring Training

We are holding two training sessions this spring to help you better manage your awards. Come to both and meeting the new research finance staff.

Wednesday, April 5 – 1 pm to 2 pm: Banner Basics to help you manage your research award  
Location: Curry Student Center, #318-320-322 – McLeod Suite

Wednesday, April 26 – 2 pm to 3pm: Financial Compliance series:

1. Charging salary to a sponsored project
2. Traveling – complying with federal Regulations

Location: Curry Student Center, #318-320-322 – McLeod Suite