Local 1949/Bemidji State University
Labor/Management
Meeting Minutes – August 27, 2015

Present: Sandy Beck, Mark Johnson, Maria Eastman, Mark Geiger, Hyram Price, Mike Schmitt, Richard Hanson, Karen Snorek, Marybeth Christenson-Jones, and Martin Tadlock

Absent: Chad Blake

1) Minutes of Previous Meeting. 7/30/15 – no changes.
2) Human Resources: Vacancy Report

<table>
<thead>
<tr>
<th>AFSCME UPDATE-Recruitment, Selection and Hiring</th>
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<tbody>
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<td>Date: August 2015</td>
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<thead>
<tr>
<th>VACANCY</th>
<th>Department</th>
<th>Result</th>
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<tr>
<td>Office and Administrative Specialist Intermediate PCN 00139750</td>
<td>College of Arts and Sciences</td>
<td>Filled</td>
<td>8/26/15</td>
<td>Sabrina Erickson</td>
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<td>Office and Administrative Specialist Intermediate PCN 01097175</td>
<td>NTC Distance MN</td>
<td>Offered</td>
<td>8/24/15</td>
<td>To be announced</td>
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<td>General Maintenance Worker PCN 00139480</td>
<td>Academic Buildings</td>
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<td>7/15/15</td>
<td>Art Kern</td>
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<td>General Maintenance Worker PCN 00139250</td>
<td>Jon Glas Fieldhouse, Rec Center, PE</td>
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<td>8/21/15</td>
<td>Clarisa Skudlarek</td>
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<td>Terry Ausk</td>
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<td>General Maintenance Worker (Intermittent) PCN 01096745</td>
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<td>8/31/15</td>
<td>David Cronemiller</td>
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<tr>
<td>Plumber Chief 01105322</td>
<td>Physical Plant</td>
<td>Filled</td>
<td>9/23/15</td>
<td>Randall Nessler</td>
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<tr>
<td>Carpenter 00140010</td>
<td>Physical Plant</td>
<td>In process</td>
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<td>Under review</td>
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| General Maintenance Worker PCN 00893600     | Residential Life         | Temporary | 9/16/14 | Assignment end 9/15/15 (Travis Bartels) |
| General Maintenance Worker PCN 00893640     | Residential Life         | Temporary | 11/19/14 | Assignment end 11/18/15 (Janis Marshall) |
| General Maintenance Worker PCN 00893570     | Residential Life         | Temporary | 8/17/15 | Assignment end unknown (Cynthia Hill) |
| General Maintenance Worker PCN 00893530     | Academic Buildings       | Temporary | 8/24/15 | Assignment end unknown (Wayne Bitz) |
| College Lab Assistant 1 PCN 00632760        | NTC                      | Temporary | 8/19/15 | Assignment end 12/23/15 (Faye Riegert) |
| Athletic Equipment Manager PCN 01095130     | Athletics                | Temporary 0.50 FTE | 8/6/15 | Assignment end 6/30/16 (David Olson) |
| Athletic Equipment Manager PCN 00139230     | Athletics                | Temporary 0.50 FTE | 8/6/15 | Assignment end 6/30/16 (George Taylor) |

| REALLOCATIONS

3) NTC: The HLC report is ready for submission, but is currently locked. Please be sure to thank the people who worked tirelessly to pull together the information required for the report. This HLC Accreditation is very relevant to BSU due to the alignment between BSU and NTC. A meeting with NTC AFSCME members will be held after the HLC accreditation is complete.
4) Local 1949:
- **Intermittent Jobs**: Administration will look into the contract language to clearly define the differences between intermittent and temporary, as well as identify the pros/cons of both.
- **Carpenter Vacancy**: Vacancy report clarified this.
- **New E-board (executive board) member**: Hyram Price is the new member, replacing Dennis Noska. Mark Johnson will have AFSCME send a list of all local members, along with their position on the board.
- **University Heights lawn care**: Mike Schmitt mentioned that lawn care at University Heights was performed by BSU grounds employees. Karen will look into the contract and will report back.
- **New Employee Orientation**: Mike Schmitt requested that AFSCME be informed of New Employee Orientations for AFSCME vacancies.

5) Administration
- **Center for Community Partnerships**: Provost/VP Tadlock briefly summarized a proposal for the Center for Community Partnerships (CCP), which would create a collaborative and unified approach to BSU outreach in the region and state. (See attachment for further information.)
- **Task force for the Reorganization of Academic Affairs**: Provost/VP Tadlock presented an opportunity for 2 AFSCME members to serve on a task force for the reorganization of Academic Affairs. (See attachment for further information.)
- **Graduate Education restructuring**: Provost/VP Tadlock submitted a proposal to restructure Graduate Studies. When the restructuring is approved, the OAS position currently held by Patty Hartshorn would be sent for an audit to attain an OAS Intermediate classification. (See attachment for further information.)
- **Grants Policies and Procedures**: VP Snorek presented three policies regarding grants.
  - The Policies and Procedures for Grants and Sponsored Programs and the Subrecipient Monitoring Policy for Grants and Sponsored Programs are policies that formalize the procedures we currently have in place.
  - The Conflict of Financial Interest Policy for Grants and Sponsored Programs is a new procedure that adds questions regarding a conflict of interest to the “green sheet” that is currently routed with a grant application. If a conflict of interest is found, it can be appealed directly to President Hanson.
- **Policies and Procedures on the website**: President Hanson announced that the Policies and Procedures web page is now up and running at [http://www.bemidjistate.edu/offices/president/policies/](http://www.bemidjistate.edu/offices/president/policies/). There will be a Policy Review Committee set up that would have two meetings per year, and also meet ad hoc if issues arise. President Hanson asked for an AFSCME member to serve on this committee: in particular, someone who is interested in reviewing and editing documents.
- **Assets**: Marybeth Christenson-Jones stated that we all have a responsibility to protect the assets of BSU and NTC, including students, faculty, and staff. Please report issues as soon as you are able. If you do not feel comfortable reporting a particular issue to your supervisor or VP, please feel free to speak to anyone in HR (without fear of retaliation).

Respectfully submitted,

Karen Snorek
Vice President for Finance & Administration

Richard Hanson     Sandy Beck     Kiki Schnackenberg (Recorder)
Bob Griggs         Chad Blake
Karen Snorek       Angie Downey
Martin Tadlock     Maria Eastman
Marybeth Christenson-Jones     Mark Geiger
                               Mark Johnson
                               Hyram Price
                               Mike Schmitt
Proposed Center for Community Partnerships

To create a collaborative and unified approach to BSU outreach in the region and state, we may wish to consider the following organizational structure.

1. Create a Center for Community Partnerships that is the umbrella organization for the following
   a. 360 Center of Excellence
   b. Optivation
   c. Marketing and Research Solutions
   d. Small Business Development Center (in the future if financially feasible)
   e. Office of Adult Education (in the future if financially feasible)
   f. CEL as ad hoc member
   g. Intern Bemidji as ad hoc member
2. Modify Karen White’s position to include Executive Directorship of the CCP
   a. 1 a-e report to Karen White
   b. Karen reports to Dean, CBTC
3. Form a CCP council
   a. Include Intern Bemidji as ad hoc council member
   b. Include CEL Director as ad hoc council member
4. Two branches:
   a. Economic and Regional Development
   b. Service Learning

1.
Bemidji State University Reorganization of Academic Affairs

When considering the Master Academic Plan, the University Strategic Plan, recent changes in configuration of the BSU/NTC alignment/NTC reinvention, and the Haag-Sauer removal, it is time to examine the organizational structure of academic affairs at Bemidji State University. The BSU Master Academic Plan exists as our guiding document and identifies four goal areas:

- Becoming financially sustainable
- Becoming distinctively BSU
- Becoming internationally competitive
- Designing organizational support for 1-3

We need an organizational structure that provides new opportunities for faculty to participate in leadership roles, promotes collegiality within and across disciplines, reduces administrative costs and reduces reassigned time in order to preserve faculty lines, and keeps student success and learning at the core of our value system.

Therefore, I am asking that an academic affairs reorganization task force be created by September 1, 2015. The task force should include representatives from all bargaining units within academic affairs and co-chaired by a senior faculty member and the interim assistant vice president for academic affairs.

Some considerations for the task force are:

1. Creatively consider all possibilities, including the following:
   a. Enhance shared decision making across academic affairs’ areas: colleges, schools, departments, programs
   b. Reduce faculty release time by 6-8 FTE equivalent (we have 17.5 FTE equivalent release time currently)
   c. Consider consolidation of departments to reduce administrative costs and reassigned time
   d. Consider appropriate alignment of departments across existing colleges/schools
   e. Provide a rotation of leadership opportunities for faculty
   f. Take into consideration the physical plant changes underway at BSU, but do not let those changes drive the recommended organizational structure

2. Recommend to the provost/vpaa by December 1, 2015 an organizational structure or set of structures for academic affairs that can be brought forward to the campus community for consideration

3. Constantly communicate and engage as many faculty and staff and students as possible throughout the process

The proposed task force membership would be:

1. 5 BSUFA; 2 MSUSAAF; 2 AFSCME; 2 BSUSA; 1 Admin/excluded
Policy Name: Conflict of Financial Interest Policy for Grants & Sponsored Programs

Policy Owner: Vice President of Finance & Administration

Policy Statement: Bemidji State University will establish standards to provide for a reasonable expectation that research provided by the investigator on a federally funded project is free from bias.

Scope and Purpose of Policy: The objectivity of research is of paramount importance and the basis for obtaining and maintaining public trust. The regulations are designed to promote objectivity in research by establishing standards which provide a reasonable expectation that the design, conduct and reporting of federally funded research will be free from bias resulting from investigator financial conflicts of interest (42 CFR Part 50, Subpart F).

Definitions

- **Significant financial interest**: anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interest (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). The monetary value would exceed $10,000 (per year) in terms of income, or would represent more than five percent (5%) ownership in a given organization (42 CFR Part 50, Subpart F).

- **Negative Disclosure**: a good faith revelation of a fact (or an item of information that is not generally known) on a disclosure form that does not lend itself to further review.

- **Positive Disclosure**: a good faith revelation of a fact (or an item of information that is not generally known) on a disclosure form that may lend itself to further review.

- **Investigator**: the principal investigator, co-principal investigators, and any other person at the institution who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by any federal agency such as the National Science Foundation and Public Health Service.

- **Dependents**: dependent children or relatives living in the same household.
Procedures:

When the University engages in or intends to engage in a sponsored project with an external organization or has subcontracted or intends to subcontract with an external organization under a sponsored project, a significant conflict of financial interest may occur when the affiliation of the project director/principal investigator (PI/PD) with the external organization meets any of the following criteria:

- The PI/PD, spouse, or dependent is an officer, director, partner, trustee, employee, advisory board member, or agent of the external organization, agency, or corporation either funding a sponsored project or providing goods and services under a sponsored project on which the PI/PD is participating in any capacity.
- The PI/PD, spouse, or dependent children is the actual or beneficial owner and has equity interest, that when aggregated for the investigator and the investigator’s spouse and dependent children, meets both of the following tests: does not exceed $10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and does not represent more than a 5% ownership interest in any single entity.
- The PI/PD has salary and any payment for services (consulting fees, honoraria, paid authorship, etc.) from a public or non-public traded entity when aggregated for the investigator and the investigator’s spouse and dependent children, are not expected to exceed $10,000 during the twelve month period.

Per Title 42 Code of Federal Regulations (CFR) Part 50 Subpart F (grant and cooperative agreements) and Title 45 CFR Part 94 (research contracts), the University must:

- Create and maintain a written and enforced policy stating the procedures for implementing the regulations.
- Inform each PI/PD of the financial conflict of interest (FCOI) regulations, of the University’s policy, and of the PI/PD disclosure responsibilities under the regulation and the policy.

Violations of this policy, such as willful concealment of financial interests or failure to comply with agreed-upon modifications to manage, reduce, or eliminate conflicts of financial interest, may result in sanctions being imposed upon the violation individual in accordance with the appropriate collective bargaining agreement.

Requirements:

Each PI/PD and co-applicant participating in a sponsored project covered by this policy must disclose whether or not they have external affiliation that may constitute a conflict of interest described in the policy above. A disclosure form is to be completed and submitted at the same time the “Review for External Funding Request” form (Green
Sheet) is submitted for approval. The form must be updated annually or whenever new significant financial interests relevant to the project are secured.

Disclosures:

**Negative disclosures** will be filed with the Grant Accountant in the permanent file with the grant, with no further review requires.

**Positive disclosures** forms will be held by the Human Resources office as sealed confidential material while a proposal is pending and will be reviewed by a Review Committee if the proposal is accepted. The review of the positive disclosure must be completed prior to the University's acceptance of the sponsored project or issuance of purchase orders or subcontract for the acquisition of goods and services.

In reviewing positive disclosures, the Review Committee will be guided by the following:

- Adherence to relevant state law and University policies, bargaining agreements provisions on Ethical Standards and Outside (External) Employment, and other University documents that may be appropriate.
- Nature and extent of the financial interest of the PI/PD, co-applicants, and their spouses or dependents to the external organization.
- Obtain additional information as needed from the PI/PD or co-applicant in resolving the actual or potential conflicts.
- Act in a timely manner so as not to delay the sponsored project.
- Identify possible actions the University might take to ensure that financial interest will be managed, reduced, or the conflict eliminated.

Based on the Review Committee’s recommendation, the University administration may take the following action:

- Accept the sponsored project award.
- Not accept the sponsored project award.
- Accept the sponsored project award subject to conditions or restriction that would manage, reduce, or eliminate the conflict of interest. Such modification might include:
  - Appropriate public disclosure of significant financial interests.
  - Monitoring of the research by independent reviewers
  - Modification of the research plan.
  - Disqualification from participation in a portion of the research that would be affected by the significant financial interests.
  - Divestiture of the significant financial interests.
  - Severance of the relationships that create actual or potential conflicts.
Appeal Process:

If the PI/PD or co-applicant(s) are dissatisfied with the Review Committee’s findings, an appeal may be made to the President, who will consult with the PI/PD and the Review Committee as deemed necessary and appropriate to the particular circumstance. The decision of the President upon appeal shall be final.

The Human Resources office shall maintain records pertaining to each disclosure in accordance with the requirements of the Minnesota Data Practices Act. Access to such records will be limited to the PI/PD(s), the Review Committee, the President, and other who have legal right to review the records, in accordance to the appropriate collective bargaining agreements. Certain sponsors, particularly federal agencies, may establish requirements that differ from this policy with regard to the timing and frequency of disclosures and other conflict considerations as well. In the case of such discrepancies, the sponsors’ requirements will generally prevail.

Rationale:

This policy sets forth procedures and guidelines to be followed to resolve actual and potential conflicts of financial interest pertaining to grants and sponsored projects.

This policy addresses Conflict of Financial Interests situations in which applicants for grants and contracts may have the opportunity to influence the University’s business decisions in ways that could lead to personal gain or give improper advantage to themselves or co-applicants (anyone involved in the design, conduct, and reporting of the research results), or their spouses or dependents. Such conflicts could affect the design, conduct, or reporting of research and project results.

Supporting References:

- OMB Circular A-21 Cost Principles for Educational Institutions – superseded by Super Circular
- OMB Circular A-110 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations – superseded by Super Circular
- OMB Circular A-133 Audits of State, Local Governments, and Non-Profit Organizations – superseded by Super Circular
- Office of Management and Budget Circular Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”)
- NSF Proposal and Award Policies and Procedures Guide
- Mankato State University Conflict of Interest Policy
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Bemidji State University Policies

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<th>Policy Name:</th>
<th>Policies &amp; Procedures for Grants &amp; Sponsored Programs</th>
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**Policy Statement:** The Policies & Procedures for Grants & Sponsored Programs were enacted to ensure that Bemidji State University and Northwest Technical College meet the Federal requirements concerning the accountability associated with Federal awards.

**Scope and Purpose of Policy:** The purpose of these Policies & Procedures is to ensure that grants and sponsored program funds follow the OMB “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (also known as “Uniform Guidance” or “2 CFR 200”) and other Federal requirements of the awarding agency concerning the accountability requirements associated with Federal awards. Also, these rules and regulation are to ensure that the Federal Government bear its fair share of the total costs in accordance with generally accepted accounting principles, except where restricted or prohibited by law. All federal awards made on or after December 26, 2014 are subject to the OMB Uniform Guidance. The Uniform Guidance replaces A-21, A-110 and A-133. Per the OMB webpage this guidance “will supersede requirements from OMB Circulars A-21, A-87, A-110, and A-122 (which have been placed in 2 C.F.R. Parts 220, 225, 215, and 230); Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up.” In the cases where there was a substantial change in the guidance, existing awards before December 26, 2014, will remain subject to A-21 and A-110 (Higher Education Institutions). For the purpose of these “Policies and Procedures”, the records of Bemidji State University and Northwest Technical College are combined and referred to within this document as the University unless specifically noted.

**Definitions**

Cost Transfers: costs that are inadvertently charged to an incorrect cost center, an incorrect amount, or the costs are unallowable.

Unallowable costs: any cost which (whether stated to be unallowable or mutually agreed to be unallowable) under the provisions of any pertinent law, regulation, or sponsored agreement.
Procedures:
Cost Transfers

In accordance with OMB, it is necessary to explain and justify transfers of charges onto federally-funded sponsored awards, where the original charge was previously recorded elsewhere on Bemidji State University’s General Ledger. Timeliness and completeness of the explanation of the transfer are important factors in supporting allowability and allocability in accordance with federal requirements.

1. When purchasing an item or when transferring a cost, the Principle Investigator (PI), Office & Admin Specialist, and the Grant Accountant should ensure the item/cost will directly benefit the project onto which the expenditure will be charged.
2. Unusual expenses are flagged and investigated by the PI, Office & Admin Specialist, or the Grant Accountant and that person will initiate a budget transaction form if the expense being charged is due to an error or unallowable cost.
3. The budget transaction form will be signed by the person initiating the form and the PI. The form is sent to the Business Office for approval and processing the cost transfer. Only the Business Office can process the cost transfer.
4. All cost transfers will be processed in a timely manner, if possible, within 90 days of the original entry.
5. The cost transfer will have the supporting documentation (original entry, receipt, etc.) and written justification for the transfer.
6. The cost transfer completed forms are retained and filed in the Accounts Payable department.

Unallowable Costs

Unallowable costs cannot be included in prices, cost reimbursements, or settlements under a government sponsored agreement to which it is allocable.

1. Reconciling accounts on a regular basis will help manage sponsored funds to ensure that expenditures and revenues are within appropriate limits and guidelines.
2. The PI, Office of Admin Specialist, and Grant Accounting Officer should be familiar with the complete list of unallowable costs for the Federal agency administering the award. The complete list of costs (the Uniform Guidance) is located at: 2 CFR 200, Uniform Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), and can include other federal requirements from the awarding agency. A few examples of categories of unallowable costs are included below from the National Science Foundation-Grant Proposal Guide found at: http://www.nsf.gov/pubs/policydocs/pappguide/nsf15001/gpg_index.jsp
   a. Entertainment
   b. Meals and Coffee Breaks
Alcoholic Beverages

3. At the end of each month, the PI, Office & Admin Specialist, and the Grant Accounting Officer examine the monthly reports and if unallowable costs are identified in the award, whether a direct or indirect cost, they are moved to the PI's cost center.

4. If there are unallowable indirect costs identified, the direct costs associated with those indirect costs are excluded from the indirect cost calculation.

Budget Revisions

Budget revisions, if they are necessary, will be in compliance with 2 CFR 215.25, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-Profit Organizations, found at: https://www.whitehouse.gov/sites/default/files/omb/assets/omb/circulars/a110/2cfr215-0.pdf, and may include other federal requirements from the awarding agency.

1. Any budget revision (external or internal) will be initiated by the PI or the Grant Accounting Officer.

2. External budget revisions that require prior sponsor agency approval will be completed according to the awarding agency guidelines. Since each awarding agency has different policies regarding the need for a budget revision (i.e. no need for a budget revision if within 10% per budget line item), the PI and/or Grant Accounting Officer will review the awarding agency policies concerning budget revisions.

3. If there is a need requiring the sponsored agency approval for a budget revision, the PI or Grant Accounting Officer will initiate the request and the Grant Accounting Officer will make the request to the sponsoring agency using the required forms. When the sponsoring agency approves the request, the Grant Accounting Officer will make the budget revisions in the accounting system and file the form in the grant folder.

4. If there are insufficient funds noted in the processing of a purchase order, the PI or designee must notify the Grant Accounting Officer of the request for the transfer of funds based on grant regulations. The request will be made on the Budget Transaction Form or e-mail and sent to the Business Office for processing and filing. These adjustments will be kept electronically and/or hard copy.

5. The reasons for a budget revision to be denied internally would be the timing of the request, budget issues, or the budget request is for an unallowable cost.

Cost Principles

All expenditures will follow and be in compliance with the Uniform Guidance 2 CFR 200.402-200.405 found at: 2 CFR 200, Uniform Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), and may include other federal requirements from the awarding agency.

1. All expenditures must follow the guidelines of the awarding agency and MnSCU Board Policies and Procedures found at: http://www.mnscu.edu/board/policy/index.html

2. The PI is responsible for compliance of respective grantor policies and regulations.

3. The PI or designee is responsible for all purchases made against the grant/contract cost center and must ensure correct coding. Also, the PI or designee is responsible for ensuring that expenditures are necessary, reasonable, allocable, and allowable under
the applicable cost principles and the grantor’s policies. Additionally, the grant expenditures must be within the budget parameters.

4. The accounts payable staff in the business office ensures the disbursements are recorded in Accounting on the Web in the correct period based on the documentation using established conventions for occurrence dates. These documents are matched with purchase orders, contracts and receipt of goods documents (if applicable).

5. The payment documents are filed in the Accounts Payable department.

**Grant Reporting (Drawdown of Funds)**

All drawdown of funds will follow and be in compliance with the Uniform Guidance 2 CFR 200.305 found at: [2 CFR 200, Uniform Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)](https://www.gpo.gov/fdsys/pkg/CFR-2021-title2-vol6/pdf/CFR-2021-title2-vol6-chap4-sec200.pdf), and may include other federal requirements from the awarding agency.

1. Payment methods must minimize the time elapsing between the transfer of funds from the awarding agency and the disbursement of those funds by Bemidji State University/Northwest Technical College.
2. Advances of grant funds will be receipted by the cashiers in the Business Office in the proper cost center.
3. Reimbursement requests will be calculated by Bemidji State University’s Business Office manager or the Grant Accounting Officer, if applicable, reviewed and approved by the Business Office manager. These are the steps to prepare the reimbursements:
   a. Run a grant summary report (AC0570CP) for the expenditures to date
   b. Run a general ledger monthly report (AC0542CP) for cash on hand
   c. Enter the information on the spreadsheet for the selected awarding agency
   d. If applicable, reviewed and approved by the Business Office manager
   e. Order negative cash amount from the selected awarding agency
4. Bemidji State University’s Business Office staff (cashiers) will properly receipt reimbursement funds.
5. The receipt will go to the Grant Accounting Officer for review and filing.

**Effort Reporting**

As a recipient of federal funding Bemidji State University/Northwest Technical College are required to comply with the Office of Management and Budget Circular Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance") and may include other federal requirements from the awarding agency for certifying effort expended on sponsored awards. The requirements for effort reporting (2 CFR 200.430) are located at: [2 CFR 200, Uniform Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)](https://www.gpo.gov/fdsys/pkg/CFR-2021-title2-vol6/pdf/CFR-2021-title2-vol6-chap4-sec200.pdf)

1. Bemidji State University/Northwest Technical College requires all individuals who receive federal sponsored funding to comply with University policies and sponsoring agency regulations regarding the proposing, charging, and reporting of effort on those awards.
2. University faculty and staff are expected to charge their time to sponsored awards commensurate with the committed effort expended on all activities they perform. Payroll
charges to sponsored awards and cost sharing recorded for faculty and staff, serve as the initial data points for the University’s effort reporting system.

3. The Uniform Guidance Subpart E §200.430 contains the federal regulatory requirements for internal controls over certifying time expended on sponsored projects. The University’s practice is to utilize an after-the-fact effort reporting system to certify that salaries charged, or cost shared to sponsored awards, are reasonable and consistent with the work performed.

4. The individual’s effort is first assigned to specific awards in the payroll system based on anticipated activities.

5. Actual effort expended on each project is certified by a responsible person with suitable means of verification that the work was performed, generally the principal investigator, at the end of specified reporting periods. The effort certification should be a reasonable estimate of how time was expended. Uniform Guidance Section §200.430(c) states, “It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to Federal awards for IHEs [Institutes of Higher Education], a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected.”

6. All employees that work on and charge payroll cost to a Federal grant must complete one of the forms listed below:
   a. Monthly Time & Effort After-the-Fact Activity Reporting Certification
   b. Timesheet
   c. Request for Faculty Extra Duty Days

7. All the activity for the period must be reported on one of the forms listed above. The document is signed by the employee and by the PI or a responsible official with first-hand knowledge of the work performed.

8. The document is forwarded to the Grant Accounting Officer and used as a basis to periodically adjust the salary cost if there is a significant variation from the original salary assignment.

9. The effort reporting document is filed in the grant file and kept in the Grants Accounting Office.

Rationale:
Policies and procedures will be in place to satisfy the corrective action required by the National Science Foundation audit findings. Also, any individual working with and/or charging time to the grant will have guidelines in place to ensure that the costs incurred are necessary, reasonable, allocable, and allowable according to Federal guidelines.

Supporting References:
- OMB Circular A-21 Cost Principles for Educational Institutions – superseded by Super Circular
- OMB Circular A-110 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations – superseded by Super Circular
- OMB Circular A-133 Audits of State, Local Governments, and Non-Profit Organizations-superseded by Super Circular
- Office of Management and Budget Circular Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance")
- NSF Proposal and Award Policies and Procedures Guide
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Bemidji State University Policies

Policy Name: Subrecipient Monitoring Policy for Grants & Sponsored Programs
Policy Owner: Vice President for Finance and Administration

Policy Statement: The Subrecipient Monitoring Policy was enacted to ensure that Bemidji State University and Northwest Technical College comply with the Federal laws and regulations and the provisions of the agreement concerning subrecipients on any Federal awards.

Scope and Purpose of Policy: Bemidji State University and Northwest Technical College are responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure proper stewardship of sponsor funds. This policy addresses institutional responsibilities and assists Principal Investigators (PI) and staff to ensure that, in addition to achieving performance goals, subrecipients comply with Federal laws and regulations and with the provisions of any agreements that govern the subaward.

Definitions

Subrecipient: a person or agency that has programmatic decision-making responsibilities for performance in carrying out a portion of the research or project.

Principal Investigator (PI): a person with the primary responsibility for monitoring subrecipients’ progress, and ensuring compliance with Federal regulations and both prime and subrecipient award terms and conditions.

Procedures:

Roles and Responsibilities
Bemidji State University and Northwest Technical College must ensure that its subrecipients comply with the Uniform Guidance administrative requirements, cost principles and audit requirements. The Bemidji State University and Northwest Technical College responsibilities include:

- Informing the subrecipient of all applicable federal laws and regulations of the agreement
- Establishing a system to monitor the performance and activities of the subrecipients’
• Making sure that all costs of the subaward are in accordance with the cost principles and procedures applicable to the award agreement (cost are necessary, reasonable, allocable, and allowable),
• All questioned costs will require additional information from the subrecipient.

**Principal Investigators (PIs) or designee** will review subrecipient invoices, identifying and following up on questionable expenditures, if necessary, and maintaining documentation of monitoring efforts. The PI may provide further training and guidance in interpreting regulations and subrecipient award terms and conditions. Grants Accounting Officer will ensure that the University’s subrecipient monitoring policies and procedures comply with federal and other applicable regulations and are applied consistently.

**Grants Accounting Officer** will ensure that the University’s subrecipient monitoring policies and procedures comply with federal and other applicable regulations and are applied consistently.

**Requirements**
The frequency and scope of monitoring procedures should be determined by the responsible PI. The Principal Investigator (PI) should use the following subrecipient monitoring procedures when appropriate:

• The PI should review technical performance reports or other specified deliverables on a timely basis. Any unforeseen issues should be documented, investigated and addressed by the appropriate authority.
• The PI and/or designee should perform an expense to budget comparison for cost-reimbursement subagreements. The subrecipient’s invoices must be itemized with the description that includes dates of travel and expense and also include Time & Effort report documentation.
• The PI and/or designee should review invoices regularly and document their review. Such documentation should include: PI initials or authorizing signature on invoices.
• The PI and/or designee should request the subrecipient to provide clarification of invoiced charges that appear unusual, excessive, or otherwise questionable. Examples of detailed justifications include:
  • Time & Effort reports
  • Copies of paid invoices showing itemized cost
  • Details of incurred travel charges stating the purpose of the travel
  • The PI may, at their discretion, facilitate on-site visits to evaluate compliance with regulations and award terms. This evaluation may include a review of the project’s scientific objectives, and the appropriateness of the subrecipient’s administrative systems, processes and charges.

**Rationale:**
Satisfy corrective action required by the National Science Foundation.
**Supporting References:**

- OMB Circular A-21 Cost Principles for Educational Institutions – *superseded by Super Circular*
- OMB Circular A-110 *Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations* – *superseded by Super Circular*
- OMB Circular A-133 *Audits of State, Local Governments, and Non-Profit Organizations* – *superseded by Super Circular*
- Office of Management and Budget Circular Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (*"Uniform Guidance"*)
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Graduate Education Restructuring

1. Joan Miller’s position moves to Assistant Director/CEL position and serves as Assistant Director of Graduate Education reporting to CEL and Provost.

2. OAS in graduate studies moves up one level and reports to Assistant Director/CEL.

3. Graduate programming reverts to college/dean oversight.

4. A college Dean serves as an ad hoc member of the graduate council on a rotating basis.