



**DONNELLY
COLLEGE**
EST. 1949

Federal Grant Accounting

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Approved by: Administrative Council

Responsible Official: VP of Business Affairs/CFO

Federal Grant Accounting Policies & Procedures

Table of Contents

- Purpose of Policies.....1**
- Employee Roles and Responsibilities1**
 - Project Directors/Principal Investigators (PIs/PDs) 1
 - Vice President of Academic and Student Affairs/Dean of the College 1
 - Grant Financial Officer 1
 - Director of Accounting 1
 - Vice President of Business Affairs/CFO..... 2
 - Vice President of Advancement/Grants Manager 2
- Cost Principles for Federal Grants2**
 - Uniform Guidance..... 2
 - Direct vs. Indirect Costs 2
 - Negotiated Indirect Cost Rate Agreement..... 3
 - De Minimis Indirect Cost Rate 3
 - Allowable Costs..... 3
 - Unallowable Costs..... 4
 - Compliance Review of Costs 4
 - Unallowable Expense Reclassification 5
 - Cost Transfers 5
- Grant Processes6**
 - Grant Financial Worksheets..... 6
 - Purchase Orders..... 6
 - Purchasing Guidelines Based on Dollar Thresholds..... 6
 - Vendor Suspension and Debarment 8
 - Contractor Davis-Bacon Compliance 8
 - Expenditure Approvals..... 9
 - Approved Purchases/Transactions 9
 - Salary & Benefit Expenses..... 9
 - Budget and Expenditure Monitoring 10
 - Budget Revisions..... 10
 - Drawdowns of Federal Funds 10
 - Record Retention 11
- Appendix A - Common Unallowable Direct or Indirect Costs.....12**

Appendix B – Journal Entry Form	13
Appendix C – Suspension and Debarment Compliance Verification Process	14

Purpose of Policies

These policies are designed to guide Project Directors, Principal Investigators, and Business Office staff in managing federal grants in compliance with the Uniform Guidance.

Employee Roles and Responsibilities

Project Directors/Principal Investigators (PIs/PDs)

Because the PI/PD is most familiar with all aspects of the project, the PI/PD must approve all grant-related expenses to ensure that they are:

- Reasonable and necessary to accomplish the project goals.
- Allowable per the terms of the award and applicable regulations.
- Consistent with institutional and federal procurement guidelines.
- Properly authorized and documented with evidence maintained that required institutional and federal procurement procedures have been followed.
- Reconciled with business office records no less than quarterly.
- Processed within the period of grant fund availability.

Vice President of Academic and Student Affairs/Dean of the College

- Oversee grant activities to ensure alignment with College's Strategic Plan and approved project activities.
- Review and approve grant purchase requests submitted by the PI/PD, verifying that all required procurement process documentation is included.

Grant Financial Officer

- Prepare drawdown requests for PI/PD-approved salary and non-salary expenses.
- Forward completed drawdown request to Director of Accounting for review and final approval.
- Process approved requests for federal funds drawdowns via G5 or ACM\$.
- Send confirmation of drawdown transaction to Director of Accounting.
- Maintain backup documentation for drawdown requests.

Director of Accounting

- Monitor grant balances against approved budgets and work with PD/PI no less than quarterly to reconcile expenses.
- Reviews and provides final approval for federal fund drawdowns after verifying that salary and fringe expenses are accurate and that all other expenses are properly recorded in the general ledger.
- Reclassifies unallowable costs or transfer costs in a timely manner (within 30 days of discovery).
- Prepares and enters adjusting journal entries after CFO approval.
- Records federal fund drawdowns in appropriate revenue account.

Vice President of Business Affairs/CFO

- Provide oversight of all accounting functions and processes related to grant financial management.

Vice President of Advancement/Grants Manager

- Maintain active SAM registration and serve as AOR for all federal grants.
- Coordinate grant proposal preparation and submission.
- Support PI/PD in grant implement, management, and reporting.

Cost Principles for Federal Grants

Uniform Guidance

The Office of Management and Budget (OMB) developed the Uniform Guidance (2 CFR, Part 200 Subpart E) to describe the treatment of direct and indirect costs on sponsored project activities that can be billed to the federal government. The Uniform Guidance applies to all federally funded projects including federal funding through a non-federal agency. The Uniform Guidance also identifies those charges that typically cannot be charged to sponsored awards and are considered unallowable expenses.

Direct vs. Indirect Costs

Direct costs are costs that are identified specifically to a particular sponsored project or costs that can be directly assigned to the project with a high degree of accuracy. Only those costs that qualify as both direct and allowable (see below for discussion of “allowable”) can be charged directly to a federal award account. Additionally, costs that are incurred and need to be accounted for as matching or cost sharing must also qualify as direct and allowable in the same manner as if they were to be charged to a federal award account. Examples of direct costs are salaries, wages, fringe benefits, consultants, materials and supplies, equipment, travel, participant costs and subcontracts.

Indirect costs are costs incurred for common or joint purposes that therefore cannot be identified easily or specifically with a particular federally sponsored project. These costs must be treated consistently when incurred for the same purpose in like circumstances. Indirect costs cannot be charged directly to a federal award account. They must be charged to a non-federal account. Examples of indirect costs (sometimes called Facilities & Administrative costs) are depreciation of buildings and equipment, computing/technology infrastructure, utility and maintenance costs, and accounting, personnel, and administrative services. Generally, these kinds of costs are identified, pooled, and charged against individual programs or funding sources using a rate designed to recover the costs.

Note: the salaries of administrative and clerical staff should normally be treated as Indirect costs. Direct charging of salaries, wages and fringe benefit costs may be appropriate only if all the following conditions are met:

- Administrative or clerical services are integral to a project or activity.
- Individuals involved can be specifically identified with the project or activity.

- Such costs are explicitly included in the federal award budget or have prior written approval of the federal awarding agency.
- The costs are not also recovered as Indirect costs.

Consistent treatment of costs is required on federal awards. A cost may not be assigned to a federal award as a Direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an Indirect cost.

Negotiated Indirect Cost Rate Agreement

Some indirect costs can be identified, pooled, and charged to a federal award using a pre-determined rate designed to recover a percentage of those costs, known as the Negotiated Indirect Cost Rate. As an institution of higher education, Donnelly College is required to apply for a negotiated indirect cost rate from its cognizant federal agency, the U.S. Department of Health and Human Services (HHS). Donnelly must have an approved Indirect Cost Rate Agreement from HHS before applying its approved indirect cost rate to any requests for federal funds reimbursement.

De Minimis Indirect Cost Rate

In previous versions of the Uniform Guidance, only entities that had never negotiated an indirect cost rate could use the de minimis rate of 10 percent of modified total direct costs. In the 2020 Updated Guidance, however, the OMB has expanded this provision to allow all entities who wish to use this 10 percent de minimis rate to apply it to federal grants received starting November 12, 2020.

Allowable Costs

Because PIs/PDs are the most familiar with project activities and the costs necessary to carry out those activities, they bear primary responsibility for ensuring that costs charged to a federal award account are allowable.

PIs/PDs should note that terms and conditions of individual awards may identify specific costs as unallowable. Certain costs are also listed in the Uniform Guidance (2 CFR 200.420 through .475) as specifically unallowable for reimbursement as either direct or indirect costs (See **Appendix A**). For all other costs, the basic considerations listed below (from 2 CFR 200.403 through .405) are applicable:

1. **Costs must be Reasonable** - A cost is generally considered reasonable if the cost of goods or services acquired, in nature and amount, does not exceed that which would be incurred by a prudent person, under the circumstances in place at the time incurred. Guidelines for determining reasonableness include:
 - Whether the cost is generally recognized as ordinary and necessary for the operation of the institution (indirect cost) or for the proper and efficient performance of the federally sponsored project (direct cost).
 - Whether the expense meets the restraints/requirements imposed by federal and state laws and regulations, sound business practices, arm's length bargaining and conflict of interest, as well as the terms and conditions of the federal award.
 - Whether the expense is in line with market prices for comparable goods or services for the geographic area (see **Procurement Procedures** below).

- Whether or not the individuals concerned acted with good judgment in the circumstances, considering their responsibilities to various constituents (the institution, the public, the Federal government, etc.).
- Whether the incurrence of the cost is a result of a significant deviation from established institutional practices and policies which could unjustifiably increase the cost to the Federal government.

2. Costs must be Allocable - A cost is allocable to specific federal awards if the goods or services involved are chargeable or assignable to the federal award in accordance with relative benefits received. This standard is met if the cost:

- Is incurred specifically for the federal award.
- Benefits both the sponsored project (direct cost) and other work of the institution (indirect cost) and an appropriate distribution can be approximated using reasonable, documented methods.
- Is necessary to the overall operations of the institution (indirect cost) and is assignable in part to the federal award (direct cost).

Note: Costs allocable to a federal award cannot be charged to other federal awards to cover cost overruns, to avoid restrictions, or for other reasons. However, costs that are allowable under two or more federal awards may be shifted among those awards in accordance with regulations and terms and conditions in place at the time costs are incurred.

Unallowable Costs

Certain costs cannot be charged to the federal government as either direct or indirect costs, even though they may be allowable under Donnelly College policies. Common unallowable costs are listed in **Appendix A** along with references to the applicable sections of the Uniform Guidance.

Compliance Review of Costs

Donnelly College takes seriously its responsibility to remain in compliance with the OMB Uniform Guidance for all its federal awards. To ensure compliance on an ongoing basis, the following procedures must be followed:

- **Before the expense is incurred** - The PI or PD for each federal award reviews and approves all proposed expenditures to ensure allowability of costs in accordance the Uniform Guidance and/or the terms of the specific contract or grant. As an additional safeguard, all purchases must have secondary approval from the grant approving manager (see **Approvals**, below). If an unallowable expense is identified before the expense is incurred, the PI/PD may either cancel the planned purchase or submit a corrected Purchase Order charging the expense to an institutional (non-federal account)
- **After the expense is incurred** – It is expected that the compliance review described above will ensure that costs will be posted to the correct grant or contract at the time of purchase. However, unallowable costs may occasionally be identified after the expense has been incurred through the PI/PD and Director of Accounting’s reconciliation of the general ledger and grant financial records prior to each drawdown of federal funds. This reconciliation process is designed to identify unallowable expenses charged to the federal award in error and to prevent

Donnelly College from incurring obligations in excess of total funds available. If an unallowable expense is discovered after the expense has been incurred, a transfer of the charge will be required. The Director of Accounting prepares a journal entry form with required documentation and enters the adjustment in the general ledger after obtaining approval from the CFO using the procedure described below.

Unallowable Expense Reclassification

If an unallowable expense has been mistakenly charged to a federal account, the Director of Accounting is responsible for making a correction as soon as possible using the following procedure:

- The Director of Accounting completes a general ledger journal entry form to reclass the expense to the correct account or department. (A blank journal entry form is included as **Appendix B.**) The entry is required to be made within 30 days of discovery.
- The Director of Accounting attaches a copy of the original expense documentation (Purchase Order and supporting documentation) to the journal entry form and forwards it to the CFO for approval.
- After approval is obtained, the Director of Accounting enters an adjustment in the general ledger, reclassifying the unallowable expense to the appropriate institutional (non-federal) account.
- If the federal funds have already been drawn down, the Grant Financial Officer refunds the federal funds using the approved repayment procedures in ACM\$ or G5.
- The Director of Accounting keeps a copy of all documentation in the Business Office and provides a copy for the PI/PD's project files.

Cost Transfers

A cost transfer is the transfer of an expenditure (either payroll or non-payroll) from one account to another, after the expenditure was initially recorded in the College's accounting system, when at least one of the accounts involved is a federal grant account.

The Federal government expects costs to be charged appropriately at the time incurred and that proper procedures are in place to assure the integrity of any subsequent adjustments to those charges. Although cost transfers may sometimes be necessary to correct errors, frequent, late, inadequately explained transfers, or multiple transfers of the same cost are viewed as an indication of poor management of funds, particularly when projects with cost overruns or unexpended balances are involved.

To avoid cost transfers, PIs/PDs and the Director of Accounting reconcile the project financial records and accounting records no less than quarterly and before each drawdown is made. When errors are identified, the procedure for reclassifying unallowable expenses is followed. Corrections should be made in a timely manner and should not require multiple transfers of the same cost.

Grant Processes

Grant Financial Worksheets

After a federal grant is awarded, the Director of Accounting will provide the PI/PD with a grant financial worksheet template to assist in tracking project expenses against approved budget line items by grant year. The PI/PD will be responsible for updating the worksheet as expenses are incurred. Prior to each drawdown, the Director of Accounting will compare the grant financial worksheet and the general ledger to make sure they agree.

Purchase Orders

Donnelly College has an approved “General Purchasing Policy” that requires approved Purchase Orders for all non-recurring expense transactions. According to the policy:

- Purchase Orders are required for all purchases, including employee reimbursements, travel advancements and other miscellaneous purchases made on behalf of Donnelly College.
- Once prepared and signed by the appropriate budget administrator, goods and services can be ordered.
- Prior approval for credit card purchases is also required. Federal grant purchases may not be charged to an employee’s personal credit card.
- Purchase Order requests must have supporting documentation attached, including required comparative pricing or bids and debarment and exclusion verification.

Refer to the Donnelly College “General Purchasing Policy” for more specific details.

It is the responsibility of the PI/PD to maintain a record of each Purchase Order as well as supporting documentation for all purchases made with grant funds.

Purchasing Guidelines Based on Dollar Thresholds

The specific procedures and documentation requirements required for federal grant purchases depend on the total amount of the purchase, rather than on the cost of individual items. For example, a purchase of three \$900 laptops would be considered a \$2,700 purchase. Similarly, a \$90,000 equipment purchase with a \$5,000 delivery/set up fee and \$8,000 in ancillary parts would constitute a \$103,000 purchase.

Procurement requirements are based on each purchase/transaction rather than cumulative purchases from a particular vendor over time. Purchases are divided into categories with differing required procedures based on threshold amount. Purchases below the current simplified acquisition threshold of \$250,000 require only informal procurement methods, while purchases totaling above \$250,000 require formal procurement methods such as sealed bids or proposals. In specific circumstances noncompetitive procurement may be permitted. More information on requirements and procedures for each category is included on the following page.

Category	Total Purchase Amount	Procedures and Requirements
Noncompetitive Procurement		
Micro purchase only	\$0 to \$10,000	<p>This method may be awarded only if one or more of the following circumstances apply:</p> <ul style="list-style-type: none"> • The item is available only from a single source. • The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation. • The federal awarding agency explicitly authorizes a noncompetitive procurement in response to a written request from the College. • After solicitation from a number of sources, competition is determined inadequate.
Informal Procurement Methods		
Micro purchase	\$0 to \$10,000	<ul style="list-style-type: none"> • No comparative pricing is required if the College considers the price reasonable based on research, experience, purchase history or other information and this information is noted on the notes section of the Purchase Order. • Selection should be based on quality and cost. • To the extent practical, purchases should be distributed equitably among qualified suppliers.
Small purchase	\$10,001 to \$250,000 (\$250,000 is the current simplified acquisition threshold)	<ul style="list-style-type: none"> • Price quotes must be obtained from at least two sources. • Quotes can be informal web searches or phone calls, but documentation of comparative pricing must be submitted with the purchase order and maintained in grant files. • Price does not need to be sole deciding factor, but documentation of other factors considered must be kept in procurement records if the vendor offering the most competitive price is not selected.
Formal Procurement Methods		
Sealed bids (preferred for construction)	\$250,000+	<ul style="list-style-type: none"> • Bids are publicly solicited, and a firm fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid conforms with the invitation for bids. • Bids must be publicly advertised and solicited from an adequate number of qualified sources (at least 3). • Invitation for bids must include any specifications and pertinent attachment and all bids must be opened at the time and place prescribed in the invitation for bids.

<p>Proposals (either a fixed price or cost-reimbursement contract is awarded)</p>	<p>\$250,000+</p>	<ul style="list-style-type: none"> • Requests for proposals must be publicized and identify all evaluation factors and their relative importance. • Proposals must be solicited from an adequate number of qualified offerors. • The College must have a written method for conducting technical evaluations of the proposals received and making selections. • Contracts must be awarded to the responsible offeror whose proposal is the most advantageous to the College, with price and other factors considered. • Special rules apply for procurement of architectural/engineering (A/E) professional services.
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Vendor Suspension and Debarment

The final step in selecting vendors for products and services purchased using federal grant dollars is to check that the vendor is not excluded from conducting federal business. This process is required by federal regulations for all goods or services contracts totaling \$25,000 or more. However, to avoid scrutiny by the federal awarding agency, **Donnelly’s policy is to check all vendors for amounts over the micro purchase threshold of \$10,000.**

Before finalizing any purchases above \$10,000, the PI/PD for the grant is responsible for checking the vendor’s status on the exclusion list in the System for Award Management (SAM) at <https://www.sam.gov/SAM>. A step-by-step guide to this process is included as **Appendix C**.

If the vendor’s entity overview shows any active exclusions (suspended, debarred, disqualified, etc.), the PI/PD may not do business with that vendor. If the vendor’s entity overview shows no active exclusions, the PI/PD may proceed with the purchase. For compliance purposes, the PI/PD is required to save a copy of the entity’s exclusion document verifying that the vendor has no active exclusions (**Appendix C** includes an example of an entity overview with exclusion status). This documentation should be retained by the PI/PD and a copy must be included with the purchase order that is submitted with the drawdown request.

Contractor Davis-Bacon Compliance

The Davis-Bacon Act applies to contractors and subcontractors performing on federally funded or assisted contracts in excess of \$2,000 for the construction, alteration, or repair (including painting and decorating) of public buildings or public works. The Davis-Bacon Act prevailing wage provisions apply to the “Related Acts,” under which federal agencies assist construction projects through grants, loans, loan guarantees, and insurance.

For prime contracts in excess of \$100,000, contractors and subcontractors must also, under the provisions of the Contract Work Hours and Safety Standards Act, as amended, pay laborers and mechanics, including guards and watchmen, at least one and one-half times their regular rate of pay for all hours worked over 40 in a workweek. The overtime provisions of the Fair Labor Standards Act may also apply to DBA-covered contracts.

Davis-Bacon Act and Related Act contractors and subcontractors must pay their laborers and mechanics employed under the contract no less than the locally prevailing wages and fringe benefits for corresponding work on similar projects in the area.

Before contracting with a contractor or subcontractor, PIs/PDs must request documentation verifying that the contractor is in compliance with the Davis-Bacon Act.

Expenditure Approvals

In addition to following the Donnelly College General Purchasing Policy, all grant-related expenditures must first be approved by the PI/PD and require additional approval as indicated in the chart below:

Request	Secondary Approval	Final Approval
Grant Purchases (Purchase Orders)	VP of Academic & Student Affairs	As required by Purchasing Guidelines
Salary Expenditures	Grant Financial Officer	Director of Accounting
Endowment Match	VP of Advancement	VP of Business/CFO
Drawdown of Federal Funds	Grant Financial Officer	Director of Accounting

Approved Purchases/Transactions

Once the PI has completed and documented the appropriate procurement process (including checking the debarment and exclusions list and confirming Davis-Bacon compliance, if required), and the Purchase Order has received all required approvals:

- The PI/PD has authority to purchase goods and services required for grant related projects and activities.
- If the cost is determined to exceed the approved amount, the PI/PD must request and obtain additional approval from the approving manager before proceeding with the purchase.
- The PI/PD retains a receipt for each transaction as supporting documentation.
- Supporting documentation can be maintained electronically, in hard copy, or both.
- The PI/PD records the transaction into the project's grant financial worksheet provided by the Director of Accounting and reconciles transaction data at the end of the month with the accounting transaction report.

Salary & Benefit Expenses

Grant-funded personnel expenses are tracked and verified as follows:

- Each Donnelly College staff or faculty member involved in project activities is required to submit a monthly Time & Effort Report to the PI/PD.
- The PI/PD signs each form and maintains digital and physical records of each month's reports.
- The PI/PD's monthly Time & Effort Report is signed by the VP of Academic and Student Affairs/Dean of the College.
- The PI/PD submits Time and Effort Documentation to the Grant Financial Officer with each drawdown request that includes salary or benefit expenses.

Budget and Expenditure Monitoring

The Business Office tracks grant expenditures against approved project budgets on a regular basis. Depending on the grant type and federal requirements, reports are generated and reviewed by the PI/PD and Director of Accounting at least quarterly as follows:

- The Director of Accounting is responsible for reporting general ledger downloads of posted transactions for each grant for the PI/PD to reconcile to grant financial worksheets.
- On at least a quarterly basis, and prior to all drawdowns of federal funds, the PI/PD and the Director of Accounting will reconcile transaction data to provide secondary review of grant expenditures.

This regular reconciliation process prevents the College from incurring obligations in excess of funds available.

Budget Revisions

Budget revisions/amendments may be requested by the PI or Project Director to support approved project activities. These requests are reviewed by the PI/PD's Supervising VP and by the Grants Manager for alignment with grant objectives and allowability of costs (according to federal regulations and available budget resources).

- If the request exceeds the level allowed by the sponsoring agency (i.e. above a percentage or dollar threshold), the PI/PD first obtains internal approval from his/her Supervising VP and then submits a budget revision request to the program officer of the sponsoring agency. Documentation of the request and response (approval or denial) must be maintained by the PI/PD.
- Once a request has been approved (internally and by the sponsoring agency's program officer, if necessary), the PI/PD notifies the Business Office of the approved change and the Director of Accounting adjusts the grant budget in the accounting system and provides a revised grant financial worksheet to the PI/PD.
- Year-end budget revision requests, such as requests to carry over funds to a subsequent grant year, are submitted to the sponsoring agency either in writing to the program officer or as part of the annual report.
- A budget revision may be denied internally if the expense is found to be outside the scope of the grant. Program officers may decline budget revision requests for many reasons.

Drawdowns of Federal Funds

PIs/PDs are required to using the following procedure to request the drawdown of federal funds to support approved grant activities:

- The PI/PD reconciles the grant financial worksheet to the Business Office accounting general ledger records. Once reconciled, the grant financial worksheet as well as any POs and other supporting documentation will be attached to the drawdown request.
- The PI/PD submits a drawdown request to the Grant Financial Officer.

- The Grant Financial Officer prepares the drawdown request and submits it to the Director of Accounting for final review, reconciliation, and approval.
- The Grant Financial Officer completes the drawdown online via G5 or ACM\$, and sends a confirmation of the pending ACH deposit to the Director of Accounting and the PI/PD.
- The Director of Accounting records the deposit to the correct revenue account.

Record Retention

During the grant term, it is the responsibility of the PI/PD to maintain the following documentation for each federally funded project:

- Initial grant application files
- Annual Grant Award Notifications (GANs)
- Grant financial worksheets
- Purchase Orders and supporting documentation (invoices, receipts, vendor suspension and debarment status, Davis-Bacon compliance, etc.)
- Time and Effort reports for grant-funded personnel
- Drawdown requests and confirmations
- Grant reports
- Any other documentation related to the project

Once the grant has been closed, all grant records (electronic and paper) are transferred to the Business Office. Per Donnelly's Record Retention policy, all federal grant records must be retained for at least three years after the submission of the final grant performance report.

Appendix A - Common Unallowable Direct or Indirect Costs

Unallowable Cost Item per Uniform Guidance 2 CFR 200	Accounting Treatment for Direct Charging to Federal Award Accounts
.421 Advertising and Public relations	<p>Unallowable. Exceptions may include Advertising costs for:</p> <ol style="list-style-type: none"> 1. Recruitment of personnel required for the performance of obligations arising from a federally sponsored project 2. Procurement of goods and services for the performance of the federal award 3. Disposal of scrap or surplus materials acquired in the performance of the federal award 4. Program outreach and other specific purposes necessary to meet the conditions of the federal award <p>Exceptions may include Public relations costs:</p> <ol style="list-style-type: none"> 1. Specifically required for the federal award 2. For Communicating project activities or accomplishments resulting from performance of the federal award 3. For Keeping the public informed on matters of public concern
.422 Advisory councils	Unallowable unless authorized by statute, the federal awarding agency or as an indirect cost where allocable to federal awards
.423 Alcoholic beverages	Unallowable
.423 Alumni/ae activities	Unallowable
.428 Commencement and convocation costs	Unallowable
.438 Entertainment costs	Unallowable except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency.
.439 Equipment and other capital expenditures	Unallowable for general purpose equipment, buildings, and land, except with the prior written approval of the federal awarding agency. Allowable as direct costs for special purchase equipment provided that items with a unit cost of \$5,000 or more have the prior written approval of the Federal awarding agency or pass-through entity.
.467 Selling and marketing costs	Unallowable except as direct costs, with prior approval by the Federal awarding agency when necessary for the performance of the Federal award.
.469 Student activity costs	Costs incurred for intramural activities, student publications, student clubs, and other student activities are unallowable, unless specifically provided for in the Federal award.

Additional costs may be unallowable under the specific provisions of different federal grants.

Appendix B – Journal Entry Form

Donnelly College				
Journal Entry Form				
Date:	_____			
Description:	_____			
Approved by:	_____			
Acct No	Acct Description	DR		CR
Totals (s/b equal)		-		-
Accounting Use Only:				
Posted by:		JE#:		Date:
	_____		_____	_____

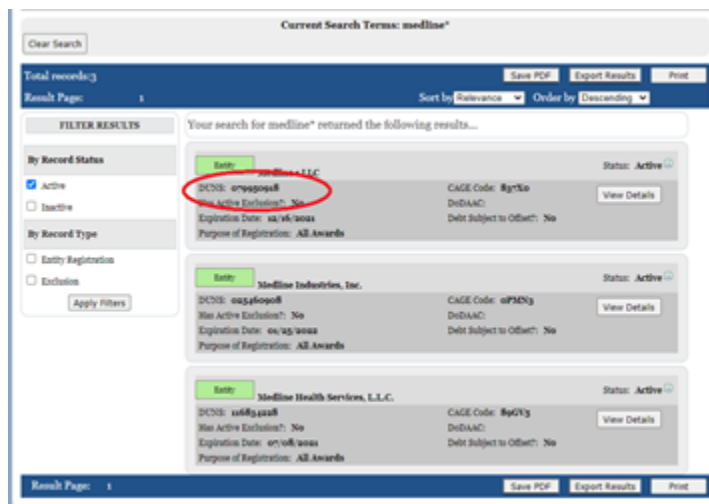
Appendix C – Suspension and Debarment Compliance Verification Process

To verify that a vendor is not on excluded from providing goods or services purchased with federal funds, PIs/PDs should follow the procedures below.

1. Go to <https://www.sam.gov/SAM/>
2. Click on SEARCH RECORDS



3. Type in the name of the company. Sometimes there will be more than one company with the same name. To determine which listing is for your proposed vendor, you can use the company's Data Universal Numbering System (DUNS) number or CAGE code, if either of those numbers is included on an invoice. If you can identify the correct entity, click on "View Details" and proceed to step #5.



4. If neither the DUNS nor the CAGE code appears on the invoice, click on “View Details” and cross check the address on the Entity Dashboard with the address on the invoice. Once you have identified the correct entity, proceed to Step #5.



5. On the Entity Dashboard page, look at the box labeled “**Exclusion Summary.**” If Active Exclusion Records reads “No,” you may proceed with purchasing from that company. If the box says anything other than “No,” this is not a company Donnelly can purchase from using federal funds.
6. Finally, print a copy of the Entity Dashboard page (shown in Step 4, above) to submit with your purchase order. This documentation verifies that you have checked the Suspension and Debarment list prior to purchasing from that vendor.