

## University of California SAS 112 Key Controls Documentation

Campus: UCSF

Area	G. – Cost sharing Level of Effort Earmarking (A-133 Audit)
Key Control	Cost Sharing commitment is identified in the system and monitored for compliance. Effort is recorded and certified per federal guidelines.
Risk	Federal awarding agency could withhold cash payments, suspend or terminate the current award, or withhold further awards to the recipient. (OMB A-110 C62)
Control Objective	Ensure that: 1. the committed amount of cost sharing was provided, 2. committed levels of effort were maintained, and 3. expenses adhere to budget category restrictions.
Department or group with primary responsibility	Principal Investigator (PI)/ Department Research Services Analyst (RSA)
Roles, Responsibilities and Accountability	
<i>(Who performs the control)</i>	<i>(Description of the control steps)</i>
PI/RSA	<ul style="list-style-type: none"> <li>* The PI/RSA are responsible for identifying and asking EMF to set up cost sharing program codes. The PI/RSA track cost sharing commitments and ensure that actual expenditures are captured on other sources.</li> <li>* The PI and applicable department administrator are responsible for ensuring only allowable categories of expenditures were included in the computation of cost sharing. They ensure that cost sharing and level of effort requirements are tracked, met and reconciled.</li> <li>* The PI/RSA make sure that the basis, allocation methodology, and calculation of cost sharing are performed by people knowledgeable of federal cost principles, the provisions of IC allocation, and applicable cost sharing requirements.</li> <li>* PI/RSA are responsible for ensuring that project expenses fall within budget category restrictions.</li> <li>* An individual who has first hand knowledge of the effort and has verifiable documentation reviews and certifies effort reports for other employees working on the federal award. They are certifying that the amount of effort reflected is the amount of effort actually expended on the project.</li> <li>* PI or other appropriate certifier reviews, edits, and certifies reported effort within 30 days after effort reports are made available. The certifier also ensures committed cost sharing is captured on this effort report.</li> </ul>
Extramural Funds	<ul style="list-style-type: none"> <li>* The cost sharing commitment reported to EMF by the department is reflected as a budgetary commitment in the GL.</li> <li>* Every transaction intended to meet cost sharing commitments will have an identifying attribute (Program Code) that will associate it with the sponsored project to which it is associated. This includes salary (effort) distributions. Only one program code can be assigned to a transaction.</li> <li>* During the close-out period, EMF reviews total project costs and prepares a final reconciliation of project costs to ensure that fiscal management guidelines have been followed including budget category restrictions. EMF incorporates actual cost sharing</li> </ul>

	<p>expenses into the financial status report (FSR). Draft FSRs are provided to departments for review and confirmation prior to finalization.</p> <ul style="list-style-type: none"> <li>* Cost sharing is included in the base in the calculation of the indirect cost rate.</li> <li>* In mid-April 2007, UCSF implemented an automated, online effort reporting system (ERS). ERS is updated with payroll, financial and department data on a monthly basis.</li> <li>* UC Office of the President's policy is that central units must distribute effort reports within 45 days after an effort report period ends and that these reports are certified by individuals within 30 days of these reports being made available to them.</li> <li>* EMF has procedures in place to send escalating reminders for delinquent effort reports. In cases of non-compliance, the EMF Compliance Manager will work intensively with department managers, chairs and/or dean's offices to resolve delinquent effort reports.</li> </ul>	
Other Department	Other	Other
Automated or Manual	Both	
Frequency	Cost Sharing and Budget Category Restrictions - ongoing Effort Reporting – quarterly	
Special Year-end Activity	None	