

**University of California  
SAS 112 Key Controls Documentation**

Campus: UCSF

Area	L. Reporting (A-133)
Key Control	Periodic financial and/or performance/technical reports for federal research agreements are submitted as required.
Risk	The federal agency can choose to either, withhold cash payments, disallow all or part of research activity or action not in compliance, terminate the award, withhold further awards or impose additional requirements.
Control Objective	To provide reasonable assurance that the financial and/or performance/technical reports include only allowable activity, are supported by the organization's accounting records or performance records and are submitted in accordance with the program requirements of the federal awarding agency.
Department or group with primary responsibility	Performance/Technical Reports: Principal Investigator(PI) and Department Research Services Analyst (RSA); Financial Reports: Extramural Funds (EMF)
<b>Roles, Responsibilities and Accountability</b>	
<p><i>(Who performs the control)</i></p> <p>PI/RSA</p>	<p><i>(Description of the control steps)</i></p> <ul style="list-style-type: none"> <li>• PI must complete and submit directly any required performance/technical reports required by the federal sponsoring agency in a timely manner. They are not reviewed by EMF before submission.</li> <li>• PI will suggest any budget revisions and consult the department fund manager, the PI's direct financial advisor, on these revisions, who then reviews and prepares the revised budget in the system. Contracts and Grants and EMF are available to PIs and departments in these situations. However in many situations, agencies give PIs discretion in re-budgeting to a certain extent, and agency approval is not required.</li> <li>• The fund manager in the department monitors due dates for program reports.</li> <li>• The PI and respective departments are ultimately responsible for ensuring that all costs charged to their awards are allowable. An edit in the PeopleSoft (accounting system) rejects any A-21 unallowable NCA charges to federal funds.</li> <li>• During the compliance review the unobligated cash balances remaining on closed projects are reviewed by the department and/or accounting office to ensure that monies will be refunded to the agency. It is noted that this normally impacts only those funds with scheduled or advance payments as all other federal sponsored agreements are on a cost reimbursement basis.</li> </ul>

EMF	<ul style="list-style-type: none"> <li>• Records are retained at least 3 years after the grant close. UC policy is 7 years.</li> <li>• A tickler file is used to determine when reports are due on awards. The newly implemented RAS system has a milestone functionality which is used for all new awards to manage and monitor the timeliness of reporting.</li> <li>• FSR drafts are sent by EMF service team accountants to departments and a concurrence document is returned in order to prepare the final FSR.</li> <li>• EMF service team leads (supervisors) are responsible for reviewing financial reports submitted to agencies for both accuracy and timeliness.</li> <li>• For LOC awards, the EMF Cash Management Manager is responsible for preparing and submitting the reports (SF-272) to the federal agencies.</li> <li>• Final financial reports are reconciled to the general ledger as part of the closeout procedure. Depending on award requirements, sometimes this reconciliation is performed not only at closeout, but also annually.</li> <li>• EMF performs a thorough “compliance review” at the close of every award. The fund file is reviewed; total expenditures are compared with amounts actually invoiced so that the final FSR can be prepared. Allowability and applicability (to the period of the award time period) of expenditures are also reviewed here, as well as the accuracy of the indirect cost rate applied throughout the award. A “Fund Closed Checklist” is used during closeout procedures to ensure that all necessary steps are taken.</li> <li>• EMF retains records for 7 years per UC policy.</li> </ul>	
Other Department	Other	*
Automated or Manual	Both.	
Frequency	As required per agency agreements.	
Special Year-end Activity	none	