



University of California
Office of the President

Vice President—
Research & Graduate Studies

Research Administration Office

Memo Operating Guidance

No. 09-03
April 8, 2009

**CGX SYSTEM CONTACTS
CAMPUS CONTROLLERS
CAMPUS EXTRAMURAL FUND ACCOUNTING MANAGERS
CONTRACT AND GRANT OFFICERS
INSTITUTIONAL RESEARCH DIRECTORS**

Subject: Reporting of American Recovery and Reinvestment Act of 2009 (ARRA) Awards and Expenditures

In response to federal reporting requirements for funds received from the American Recovery and Reinvestment Act (ARRA), we are providing guidance on the new procedures that UC recipients of ARRA funds will be required to implement in reporting awards and expenditures involving these funds to the Office of the President. This guidance does not address project-by-project federal reporting requirements; the focus here is on award and expenditure reporting within UC.

A work group comprised of individuals from the Institutional Research Office, the Financial Management Office, and the Research Administration Office at the Office of the President (OP) was convened to determine the procedures necessary for OP to incorporate ARRA data into the Contracts & Grants (CGX) and the Corporate Financial System (CFS) databases that are maintained at OP. Two systemwide conference calls were held on March 18, 2009, and April 1, 2009, bringing together this work group and the campus Contract and Grant Managers, the campus Extramural Fund Managers and other interested parties to discuss and obtain feedback on the suggested solutions being considered to capture this information at the campus level for inclusion in CGX and CFS. This Guidance Memo is the result.

ARRA Reporting Requirements

The Act provides that recipients of ARRA funds must comply with a number of new reporting requirements, some of which are outlined by the National Institutes of Health in a March 2, 2009 document specifying the Standard Terms and Conditions for ARRA awards (http://grants.nih.gov/grants/policy/NIH_HHS_ARRA_Award_Terms.pdf). Reporting to fulfill ARRA

requirements is incumbent on the immediate campus and laboratory recipients of these funds, and will necessitate certain changes to campus contracts & grants and financial systems.

The Office of the President will also be called upon to provide detailed information to the Regents, to external auditors, and to the public, on the University of California's systemwide receipt and utilization of ARRA funds. This will require additional award and expenditure information from reporting locations, along with corresponding changes to the Contracts & Grants (CGX) and Corporate Account Fund Profile (CAFP) data systems maintained by the Office the President, as detailed in this memo.

The financial reporting changes described below will be effective as of April 1, 2009, and will apply to all expenditure reports provided to OP as of that date. Changes to the reporting of awards to the CGX system will be effective as of July 1, 2009, and will apply to all awards reported for Q409. This immediate implementation requirement is a departure from the usual process. Normally, campuses are given a minimum six-month notice for similar changes; however, the unique circumstances regarding the receipt of ARRA funds necessitate this extraordinary request.

Reporting ARRA Awards to the Contracts & Grants (CGX) System

1. Assign New Award Numbers for all ARRA awards.

To identify ARRA awards, and to segregate them from other federal funds, reporting locations will be required to assign a new Award Number for all ARRA awards, **including supplements, extensions and continuations of existing awards**. It is expected that most funding agencies will be assigning their own new award numbers for supplements to existing awards. But even if this is not the case, UC's internal tracking systems will require new Award Numbers to keep the ARRA support portion separate from the non-ARRA funds.

2. Flag ARRA Awards Using a New CGX Data Element.

To unambiguously identify all ARRA awards, the CGX system will be modified to include a new, single-character data element that can be used to denote ARRA and other special-source funds. Currently, this field will have a single valid value of 'A' for ARRA, and should be left blank for all other awards. The new CGX Data Element will have the following characteristics:

Name:	<i>SPECIAL FUND SOURCE</i>
Type:	<i>ALPHANUMERIC</i>
Length:	<i>1</i>
Format:	N/A
General Description:	Code indicating that the award is received from a special fund source.
Code Interpretation:	'A' – American Recovery and Reinvestment Act (ARRA) Award

The Special Fund Source field will occupy Position 409 (currently a blank field) on the 415-character CGX Award File Layout for Award Reports transmitted to the Office of the President each fiscal quarter. Additional information on the Award File Layout may be found here: http://www.ucop.edu/irc/campus_specs/cgx/cgxawddt.html.

The 'A' flag should be used for **both direct federal awards as well as subcontracts** involving ARRA funds from other parties, including State and private sponsors. This will allow the CGX system to identify and categorize all ARRA funds, regardless of whether they are received directly from federal sponsors or as flow-through from secondary parties.

3. Invalid Fund and Account Data for ALL Awards (Except MTAs) Will Result in Rejected Errors.

Effective as of the Q409 reporting period, the Award Edit Report will treat **all** award records (except material transfer agreements) with invalid or missing Fund and Account numbers (including 999... numbers) as Rejected Errors, rather than as Processed Errors. This procedural change is necessary for identifying and reporting on all ARRA subcontract funds that come to UC as flow-through from non-federal entities.

As noted below, the Corporate Account Fund Profile (CAFP) system is incorporating a new set of federal flow-through codes for ARRA funds. To bring this data into the CGX corporate system, there must be an accurate match of Location, Account and Fund Number to the Corporate Account Fund Profile portion of the corporate accounting system. The only way to ensure that ARRA subcontract awards are identifiable is to require valid Account and Fund numbers in award reports, and correct assignment of flow-through codes (as described below) when these numbers are reported.

There are some exceptional situations where Account and Fund Numbers matching those in CAFP cannot be provided by reporting locations, and special error-handling routines will be developed in consultation with those locations. The Proposal Edit Report will continue to treat records with missing or invalid Fund and Account numbers as Processed Errors.

Corporate Account Fund Profile (CAFP) System Changes

1. Assign New Fund Group Codes to ARRA Awards.

To identify ARRA awards, including appropriations, grants and contracts, and to segregate them from other federal funds, four new Fund Group Codes will be incorporated into the CAFP system, and two new Flow Through Codes:

<i>Name:</i>	FUND GROUP CODE
<i>Type:</i>	ALPHANUMERIC
<i>Length:</i>	6

Format:	N/A
General Description:	Code indicating the category to which a fund belongs in the University's accounting structure.
New Code Interpretation:	100210 – Federal Grants, Plant Funds-ARRA 406110 – Federal Appropriations-ARRA 406230 – Federal Grants-ARRA 406340 – Federal Contracts-ARRA

2. Assign New Flow Through Codes to Subcontract ARRA Awards.

Two new Flow Through Codes have been established to identify grants or contracts that are fully or partially funded by ARRA funds:

Name:	FLOW THROUGH CODE
Type:	ALPHANUMERIC
Length:	1
Format:	N/A
General Description:	Code indicating actual fund source (federal, State, local government or private funding). For private funding sources, indicates whether the funding was given to the Regents by a campus foundation, and if it is endowment income from the foundation.
Code Interpretation (new codes in bold italics):	'1' – Gift, contract, grant, or other agreement funded 100% by a non-federal source that is also not a campus foundation. '2' –Contract, grant, or other agreement funded partially by federal funds and partially by a State or private source. '3' – Contract, grant, or other agreement funded 100% by federal funds, although allocated by a State or private source. '4' – Gift from a campus foundation comprised of foundation endowment income. '5' – Gift from a campus foundation that is not foundation endowment income. '6' –Contract, grant or other agreement funded partially by federal ARRA funds, and partially by a State or private source. '7' – Contract, grant or other agreement funded 100% by federal ARRA funds, although allocated by a State or private source.

Corporate Financial System Changes

1. Assign New Object Code for First \$25K of All Awards

A new object code for the first \$25,000 of a subaward is being created to complement the existing object code 7300 for subawards in excess of \$25,000. This new object code should be used for all subawards made to other entities.

<i>Name:</i>	<i>OBJECT CODE</i>
<i>Type:</i>	<i>ALPHANUMERIC</i>
<i>Length:</i>	<i>4</i>
<i>Format:</i>	<i>N/A</i>
<i>General Description:</i>	Code indicating the purpose, type of goods, or service for which an expenditure was incurred.
<i>New Code Interpretation:</i>	7270 - First \$25K of subaward, so that in conjunction with the already existing object code 7300 for subawards, it will be possible to calculate the full population of expense. Note that the first \$25K of each subaward is subject to application of F&A costs, while the amount above \$25K is not.

If you have any questions on these new procedures, please contact:

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Thank you.



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