

**NOVA SOUTHEASTERN UNIVERSITY
OFFICE OF SPONSORED PROGRAMS
POLICIES AND PROCEDURES**

**AWARD MAINTENANCE
EQUIPMENT OWNERSHIP, ACCOUNTABILITY, AND RECORDS
EFFECTIVE 12-01-08, REVISED 12-26-2014
POLICY #33
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PURPOSE:

To establish a policy and procedure for the ownership and recordkeeping of equipment purchased under sponsored awards and define the responsibility for accountability for such equipment.

DEFINITIONS:

Accountable Officer: Both the Principal Investigator/Project Director (PI/PD) and the PI/PD's College/Center will be designated as the property custodians and the primary responsible parties for management of equipment and property acquired under a sponsored project.

Equipment: Nonexpendable tangible personal property having a useful life of more than one year, an acquisition unit cost of \$1,000 or more, and an identity which is not altered materially through use.

POLICY:

Subject to the obligations and conditions set forth by the sponsor, equipment purchased under sponsored projects is the property of the university except where the terms and conditions of the award vest ownership in the sponsor. The Principal Investigator/Project Director (PI/PD) and the College/Center administrator are property custodians for equipment purchased under a sponsored project. If equipment is acquired with federal funds, the federal government retains an interest in the property even though the university owns it. (2 CFR. § 200.316). Equipment shall be labeled/tagged and results reconciled with the university's property records on at least every two years (refer to Finance Policy No. 115 – *Property and Equipment* and Finance Policy No. 127.11) in accordance with 2 CFR 200.313.

REFERENCES:

- OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200, <https://federalregister.gov/a/2013-30465>
- OMB Federal Awarding Agency Regulatory Implementation of Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, <https://www.federalregister.gov/articles/2014/12/19/2014-28697/federal-awarding-agency-regulatory-implementation-of-office-of-management-and-budgets-uniform>
- NIH Grants Policy Statement, <http://grants.nih.gov/grants/policy/policy.htm#gps>
- NSF Proposal and Award Policies and Procedures Guide, <http://www.nsf.gov/bfa/dias/policy/>
- HHS Grants Policy Statement, <http://www.hhs.gov/grants/grants/policies-regulations/index.html>
- Federal Acquisition Regulations (FAR), Title 48 C.F.R.
- NSU Accounting & Financial Policies and Procedures Manual, Finance Policy 127 – *Administration of Sponsored Programs/Projects* and Finance Policy 115 – *Property and Equipment*, <http://www.nova.edu/fop/forms/policies.pdf>

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PROCEDURES:

1. The PI/PD must use equipment acquired with sponsored funds in accordance with the sponsor's terms and conditions. The OSP can assist the PI/PD in identifying use restrictions, if any, under the sponsored project.
2. Both the PI/PD and their administrative delegates in the College/Center have responsibility for control and proper stewardship of equipment acquired with sponsored funds.
3. PIs/PDs and Colleges/Centers must follow NSU Accounting & Financial Policies and Procedures for managing fixed assets (Finance Policy Nos. 115 – *Property and Equipment* and 127.11 - *Equipment, Machinery and Furniture Purchased with Sponsored Program/Project Funds*. If the sponsor's policies are more restrictive than university's policies, then the university must follow the sponsor's policies.
4. Equipment acquired with sponsored funds that will not be physically located on NSU property will be subject to the same university policies and procedures for managing fixed assets.
5. Financial Operations will perform the university's physical inventory and property records reconciliation a minimum of every two years. Title to ownership of equipment acquired under a sponsored project is determined by policies, terms and conditions of the award.
6. If equipment is not in usable condition, all attempts must be made by the university to reasonably repair the piece of equipment. If it is determined that repair is more costly than replacement, then disposal may occur in accordance with Finance Policy No. 115 – *Property and Equipment*.
7. Disposition of equipment acquired in whole or in part with sponsored funds must be in accordance with Finance Policy No. 115 – *Property and Equipment* and sponsor's terms and conditions.
8. The Contracts and Grants Accounting Department (CGA) will work with the PI/PD to prepare and submit required fixed assets reports to the sponsor related to equipment for sponsored programs.
9. When moving equipment purchased under a sponsored project to another organization, the PI/PD must obtain approval from his/her Dean or designee (i.e., Chair). In addition, the new organization must agree to assume all responsibility associated with this equipment, including but not limited to all packing, transportation and re-calibration expenses associated with moving the equipment. Once all agreements and assurances have been obtained from the new organization, the Fixed Assets Department in Financial Operations must be informed so that they can proceed with proper equipment management and inventory procedures.