

Research Office Policy 24-006

Responsible Executive:
Vice President for Research
Responsible Office: OSRAA

Effective: 1/1/2024 **Last Revised:** 12/22/2023

Bracketed Funding / Restricted Carryforward on Sponsored Projects

1. Summary

- **1.1.** This policy summarizes Oregon State University's ("OSU") responsibility and assists Principal Investigators and university staff to ensure that charges on sponsored awards with bracketed funding periods are properly allocated, reported, and claimed in accordance with the terms and conditions of sponsored awards.
- **1.2.** The scope of this policy is University wide. Principal Investigators and sponsored project personnel, as well as OSU personnel involved with the conduct and administration of sponsored award activities are affected by this policy.

2. General Requirements

2.1. Federal Guidance

OSU has a responsibility to comply with OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR §200) ("Uniform Guidance"), specifically sections §200.303 *Internal controls* which sets forth the requirements to establish and maintain effective internal controls over federal awards, §200.403 *Factors affecting allowability of costs* which sets forth the requirements to ensure that costs are incurred during the approved budget period, and §200.302 *Financial management* which sets forth requirements for maintaining accurate, current and complete financial records sufficient to permit preparation of reports required by award terms and conditions.

2.2. Sponsored Award Terms

OSU has a responsibility to provide a consistent methodology to ensure separate tracking and reporting of funds where automatic carryforward from one budget period to the next is not authorized by the award terms set by the sponsoring agency.

Uniform Guidance requires that the university identify federal awards and programs with accurate, current, and complete financial records in accordance with the reporting requirements, making it necessary to segregate, finalize, draw/invoice, and report on these funds at the conclusion of each budget period. This segregation of funds allows OSU to reproduce a list of expenses for each distinct budget period when carryforward is restricted.

3. Definitions

- **3.1. Bracketed funding, also referred to as bracketed spending** A subset of project funding restricted to a shorter budget period than the overall sponsored project period of performance. These funds may need to be tracked, reported, or invoiced separately from other project funds **and** do not have automatic carryforward of any remaining funds into future periods of performance or task(s) without sponsor approval.
- **3.2. Carryforward** The unspent or unobligated balance of funds from prior budget period(s) which the recipient may request to use in the current budget period to meet the needs or support the objectives of the project. Awards on which carryforward is restricted will be treated as bracketed funds. The terms *carryforward*, *carry forward*, *carry over*, and *carryover* are often used interchangeably, and at OSU will be taken to have the same meaning.

4. Responsibilities

- **4.1.** All OSU personnel who engage in sponsored projects are expected to follow federal regulations, OSU policies, and sponsoring agency terms and conditions for timely and accurate charging and reporting of expenses.
- **4.2.** See roles and responsibilities information in the associated *Guidelines for Bracketed Funding / Restricted Carryforward on Sponsored Projects*.

5. Process

- **5.1.** It is expected that expenses will be recorded in the university's official financial record system to facilitate timely reporting, claim submission, and closeout.
- **5.2.** If determined that carryforward is restricted for the budget period, detailed procedures are provided in the following documents:
 - 5.2.1. Standard Operating Procedure: Managing Awards with Bracketed Funding / Restricted Carryforward on Sponsored Projects located on the OSRAA <u>Training</u> webpage
 - **5.2.2.** Guidelines for Bracketed Funding / Restricted Carryforward on Sponsored Projects located on the OSRAA Policies webpage
 - **5.2.3.** Carryforward Request Template located on the OSRAA Forms webpage

6. Related Information

- **6.1.** Website for this policy: https://research.oregonstate.edu/osraa/osraa-policies
 - 6.1.1. Guidelines for Bracketed Funding / Restricted Carryforward on Sponsored Projects, companion to this policy
- **6.2.** OSRAA Frequently Asked Questions (FAQs)
- **6.3.** OSRAA <u>Training</u>
 - 6.3.1. Standard Operating Procedure: Managing Awards with Bracketed Funding / Restricted Carryforward on Sponsored Projects
 - 6.3.2. Workflow: Managing Awards with Bracketed Funding / Restricted Carryforward on Sponsored Projects
 - **6.3.3.** OSRAA Outreach and Education recording, 11/16/2023
- **6.4.** OSRAA Forms
 - 6.4.1. Carryforward Request Template
 - 6.4.2. Rebudget Form for Sponsored Projects
 - a) Rebudget Guidance and Prior Approval Matix
- 6.5. Finance and Administration Controller's Unit Forms
 - 6.5.1. Sponsored Award Closeout Checklist
- **6.6.** Federal Uniform Guidance
 - **6.6.1.** OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards §200.303 Internal Controls
 - **6.6.2.** OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards §200.403 Factors Affecting Allowability of Costs
 - **6.6.3.** OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards §200.302 Financial Management
- **6.7.** Please check with your supervisor for unit-level procedures related to this rule and other resources that may not be listed here.

7. History

7.1.1. Original Issue Date: 1/1/2024

- **7.1.2.** Previous Versions: None
- **7.1.3.** Next Scheduled Review Date: 12/1/2026

8. Contacts

- 8.1. Policy Steward: Director of Sponsored Programs, Award Management (contact info)
- **8.2.** Office for Sponsored Research and Award Administration (OSRAA) Inquiries: OSRAA@oregonstate.edu