

## **POST-AWARD MANAGEMENT** (A.K.A. I've been awarded my grant...Now what do I do?)

Congratulations on being awarded your grant! You're now flush with cash, but how do you spend it?

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### **Award Establishment**

Once The Research Foundation (RF) receives official notification that your grant has been funded, a series of events take place. The Award Establishment and Maintenance Unit of the [Office for Sponsored Programs](#) (OSP) will create a Project-Task-Award (PTA) number(s) for your grant and any related sub-awards. As long as any necessary human subjects (IRB) and/or animal subjects (IACUC) approvals are in place, you will receive a hard copy of the abstract for your PTA. You will need this number to access your grant funds.

Depending on the way your funding is structured, it is possible that you will receive a new PTA for each year of your sponsored project.

### **Monitoring Grant Financial Activity**

The RF has a web-based system to allow PIs to monitor the financial activity of their grants. This system is called Principal Investigator Award Interface (PIAI) and provides PIs (or others whom they designate) the ability to see the grant's budget, what has been spent, what is encumbered, and what balance remains in each budget category. In order to access PIAI, you must first register to gain access to the Research Foundation [web portal](#). Instructions for registering can be found by [clicking here](#). Once you gain access to the web portal, then you can request access to the PIAI by [clicking here](#). The PIAI can be accessed from any computer, either at home or at SUNY.

The PI is responsible for verifying that all expenses submitted for payment have been paid and that there are no unauthorized charges made against his/her grant. For this reason, it is important that the PI (or financial manager) reconciles the grant against the financial information in PIAI. This is like balancing your checkbook on a monthly basis to ensure that there are no bank errors.

### **Budget**

As you are aware, your grant has a budget that has been approved by the sponsoring agency. Part of effective post-award management is making sure that you stay within your budget parameters. PIAI is an effective tool to help with this. There will occasionally be times when you come to the realization that your projected expenses in one or more budget categories are either significantly more or less than you had planned. In cases such as these, PIs do NOT have the authority to simply change their budgets. Each sponsor has specific policies when it comes to making budget modifications that must be adhered to. If you need to modify your budget you must contact your [OSP Research Administrator](#). He/she will help you secure the required written permission from your Project Officer at your sponsoring agency. This written permission must be on-file with the RF before any budget changes can be made.

## **Sponsored Funds Personnel**

### *Personnel Matters*

[Sponsored Funds Personnel](#) (SFP) is responsible for the management of RF personnel functions at the University at Albany, including review of all personnel activity to ensure that it complies with RF policies and procedures, sponsor policies, and State University of New York policies where required. SFP is responsible for employee classification and compensation; payroll; benefits; time, attendance, and leave accruals; employee relations; and employment immigration and visa services.

### *Position Classification*

In order to comply with applicable laws, the RF has established a [position classification system](#) for its employees for the purpose of maintaining salary and wage equity and for consistency in the treatment of its employees. Within the RF position classification system, all positions are categorized as exempt or nonexempt, and each position title falls within a [specified pay range](#). Prior to recruiting employees, the following classification steps should be completed:

Position Classification Steps	
1	Prepare a <a href="#">job description</a> .
2	Determine and Certify <a href="#">Fair Labor Standards Act</a> exemption.
3	Determine appropriate RF position standard from one of the following job series. The RF position standard must reflect the work to be performed as described in the job description.  <a href="#">Research/Clinical Investigator Classification Series</a>  <a href="#">Research Technical Support and Service Classification Series</a>  <a href="#">Project/Program Administration Classification Series</a>  <a href="#">Nonexempt Salary Structure</a>

### *Affirmative Action Search Procedures*

Recruitment and selection procedures can be located in the [Office of Diversity and Affirmative Action](#).

A full, open search is **not** required in the case of:

1. Appointments of six months or less.
2. Appointments of 50% obligation or less, regardless of duration.
3. [Postdoctoral appointments](#).
4. [Student appointments](#).

### *Undergraduate and Graduate Student Employment*

The RF encourages the employment of full-time SUNY students on sponsored programs relating to their fields of study. In order to do this, a student [fringe benefit rate](#) has been established for

full-time SUNY students, which is lower than the charge on salaries and wages paid non-student employees. The student fringe benefit rate is charged against salaries and wages paid employees appointed to the student titles.

In order for an employee to be appointed to a student title the employee must be enrolled as a full-time SUNY student. To be certified full-time study, graduate students must: hold a full assistantship and be enrolled in 9 credits, or be registered for one dissertation load credit; undergraduate students must be enrolled in a minimum of 12 credits. The employee must also be engaged in work related to the student's education and training that leads to the fulfillment of academic requirements.

Full-time SUNY students can work a maximum of 20 hours per week (50% FTE) during the academic year. Students who have state appointments for less than 50% FTE can have a concurrent RF appointment, as long as the combined FTE does not exceed 50%. For example, a graduate assistant may be working 10 hours per week as a state appointee (25% FTE). He/she is then eligible for an RF appointment for up to 10 hours per week (25% FTE). Students may be eligible for full-time employment during the summer months if they were registered as a full-time student during the preceding academic year. More information on [student employment](#) can be found on the SFP Webpage.

#### *Regular Employees*

Many grants hire non-student personnel in various capacities (project staff assistants, research technicians, etc.). Most non-student RF employees are classified within the RF regular employee assignment group. A regular RF appointment is a full-time or part-time assignment that is not a summer-only or extra-service.

#### *Summer Employees*

The summer-only employee, including an eligible faculty member, is an employee whose appointment period is within the "summer period" as defined by the campus academic calendar, but also must be between May 1 and September 30. Summer-only employees are charged a lower fringe benefit rate as compared to a regular employee assignment. A summer-only appointment can only be used when *all* of the following conditions are met:

- The position is being established to reflect an operating location's special needs during the summer months or for use in compensating an academic-year employee for sponsored program activity outside of the academic year.
- The employee is not currently employed by the RF in an ongoing position.
- There is no expectation that the position will continue during the academic year.
- The employee is not on the RF payroll in a regular appointment prior to the proposed summer-only appointment.

A summer-only assignment is limited to four months. Summer-only assignments for SUNY faculty members with academic year obligations may be further limited by SUNY policy to a two-month appointment, except when approved for up to three months by the campus president or designee, provided that:

- the period of proposed employment does not overlap any part of the academic-year obligation, and

- the sponsor policy does not otherwise restrict or limit such employment.

Full-time SUNY employees with academic-year obligations should use the [SUNY Summer Salary Limitations Chart](#) to calculate their summer salary rate.

Summer salary appointments must fill out all of the employment forms described below under “Required Forms.”

#### *RF Holiday Schedule*

[The Research Foundation’s Holiday Schedule](#) provides instructions to employees and PIs regarding RF’s holiday leave guidelines. When classes are in session, departments *may* be open on a holiday if the department provides essential services, or in emergency situations, if approved by the appropriate Vice President. Employees are instructed to consult with their manager to determine if their department is closed on these days. Employees required to work on a holiday will receive holiday leave credit to be used on an alternate date, subject to supervisory approval. Managers should not unreasonably withhold use of holiday leave and should encourage employees to use this leave within a reasonable period of time (i.e., within 1 calendar year).

Employees assigned to the following student titles(s) are not eligible to receive holiday leave: Research Project Assistant, Project Instructional Assistant, Research Graduate Assistant, Research Aide, Senior Research Aid and Student Camp Counselor.

#### *Classifying Workers as Employees or Independent Contractors*

Classifying a worker as an independent contractor rather than as an employee may appear to result in financial savings and less paperwork. However, if the employee is misclassified as an independent contractor, these perceived advantages are offset by the potential penalties that could be assessed by the Internal Revenue Service or New York State Department of Labor, by potential Workers' Compensation or unemployment claims, and by liability or malpractice suits.

Principal Investigators should ensure that workers are properly classified when reviewing application budgets and when hiring an employee or engaging an independent contractor. **The RF is legally obligated to properly classify workers even if a sponsor provides funds for independent contractors in an award.**

In general an *employee* is subject to the control of the employer as to *what* work must be done and *how* the work must be done. It is not necessary that the employer actually direct or control the manner in which the services are performed; it is enough that the employer has the *right* to do so. Under the common law rules cited in IRS rulings, an employee-employer relationship exists when the organization for which services are performed has the right to control and direct the individual who performs the services, not only as to the result accomplished by the work, but also as to the details and means by which the result is accomplished.

An *independent contractor* is subject to the control and direction of the organization for which services are performed only as to the *result* of the work and not as to the means. An independent

contractor is compensated based on an established fee and payment is made through the RF's vendor payment system. Their procurement falls within the jurisdiction of the Office of Purchasing & Contracts and Accounting/Sponsored Funds Financial Management (see below).

### *Required Forms*

To appoint an employee, including undergraduate and graduate student employees and eligible faculty summer employees, to the RF payroll, **all** of the forms located on the [New Employee Forms](#) section of the website **must** be completed, or you can call 437-4500 to request a new-hire packet. To avoid payroll delays, please ensure that all forms are completed and submitted to Sponsored Funds Personnel, Management Services Center Room 326, by the [payroll deadlines](#).

## **Sponsored Funds Financial Management**

### *Financial Management*

[Sponsored Funds Financial Management](#) or SFFM (formerly referred to as Sponsored Funds Accounting) is responsible post-award administration and financial compliance for all grants and contracts received by the RF. Specifically, they approve all non-procurable payments; travel advances and reimbursements; subject cost payments; participant stipends; and consultants. Each sponsored award is assigned to a [SFFM Grant Administrator](#) in SFFM based upon the organization/department receiving primary credit for the grant on the [Campus Impact Statement](#).

### *Income Fund Reimbursement (IFR)*

Faculty members whose grants support release time (either a full course buy-out (17% time for many of the Schools and Colleges at the University or another percentage of time) need to complete the [Income Fund Reimbursable Form](#) in order for their department to receive the money. The IFR process is the mechanism by which a research award or contract reimburses the salary and fringe benefits paid to state funded faculty and staff devoting effort to research grants and contracts. IFR paperwork requires the signature of the PI (or financial manager), department chair, and dean before it can be submitted to the RF for processing. Faculty members on IFR are not considered employees of the RF.

[IFR requests](#) should be made in a timely manner - - within 90 days from the beginning of the IFR appointment period. Any requests submitted later than 90 days after the start of the period will be considered exceptions and the project manager must provide a detailed explanation for why the request was not submitted in the appropriate timeframe. SFFM reserves the right to reject any IFR request which places the University at risk for an audit finding or disallowance.

### *Effort Reporting*

Each person who is paid with grant funds is expected to dedicate the indicated amount of effort to the project. As such, Sponsored Funds Financial Management sends Effort Reporting forms to PIs three times per year (at the end of each semester and at the end of the summer). The PI must sign and return the forms to certify that the individuals named in the reports did in fact work the reported effort percent. Failure to certify employee effort on a timely basis could result in disallowances by federal auditors.

### *Payments & Reimbursements*

The basic form needed for most transactions with SFFM and the [Office of Contracts and Purchasing](#) is the RF Purchase Requisition (PR) form. Each form has its own unique ID number, so hard copies of these forms must be requested online via the [Purchasing Office's website](#).

The PR form asks for basic information, such as who is making the request, which PTA needs to be charged, expenditure type (supplies, conference expense, etc.), and a detailed description of the expenditure. How the expense relates to the award needs to be included as justification, especially for any meals that are being reimbursed. Meeting expense reimbursements also require a copy of the meeting agenda, a list of attendees, and an **ITEMIZED** receipt showing what food and drinks were ordered. SFFM requires this documentation to ensure that no alcohol charges are being reimbursed with sponsored funds. Alcohol is considered an unallowable expense in accordance with Federal regulations.

### *Travel*

Conference and research travel are common aspects of many grants. SFFM will issue travel advances when requested two weeks prior to the travel date using the appropriate [Travel Form](#). Post-travel reimbursement is processed using the same form. Travel expenses (meals & hotel) are reimbursed based upon federally established per diem rates for the destination ([Travel Rates and Schedule including US Per Diem](#)-log in and click on Rates; [Foreign Per Diem](#)). The RF cannot reimburse above the Federal per diem rates unless there is acceptable written justification showing how the award benefits from this additional cost. If a conference is being hosted at a hotel and there is a published, negotiated conference rate (higher than the per diem), the RF will reimburse at the conference rate with documentation. PIs who need to travel internationally must check with their Grant Administrator before making any travel arrangements. There could be restrictions on foreign travel based on sponsor policy or other Federal regulations.

Flight reservations can be made either directly with the airline, through a website, or through a travel agent. [Advantage Travel](#) will directly bill the RF and will eliminate the need to charge a personal credit card and wait for reimbursement.

All requests for travel reimbursement require original detailed receipts. Conference travel requires proof that the traveler actually attended the conference. Acceptable proof is a copy of your conference name tag or a copy of the conference brochure. Travel for meetings requires a copy of the written agenda.

### *Subject Costs*

Sometimes awards provide payments to human subjects as an incentive for them to participate in the study. The PI may also choose to use gift cards or other non-cash incentives in lieu of actual cash payments. The PI should speak with his/her [SFFM Grant Administrator](#) regarding the appropriate paperwork necessary to process the incentive payment.

### *Participant Stipends*

Participant stipends are payments for participation in vocational training, secondary school training, and other non-academic programs. It is not related to an academic endeavor. There is no real wage, just the expectation that the participant be present at some event. The necessary form can be found on the [SFFM web site](#).

### *Graduate Assistants Tuition*

In many cases where a grant allows hire of a graduate assistant, it is typical that their tuition is paid by the grant as part of their compensation package. In order for the grant to pay tuition, the PI needs to send an email request to [Christine McLaughlin](#) in the [Office of Student Financial Services](#) indicating that the grant will be paying \$X of the graduate assistant's tuition for the semester and asking that the PI be sent an invoice. Once the invoice is received, a Purchase Requisition needs to be completed and sent to SFFM, indicating payment of the graduate assistant's tuition for X semester. The graduate assistant's Social Security number needs to be listed on the Purchase Requisition because their student ID is not sufficient for the RF to document the student's account.

### *Consultants*

Consultants are not employees of the RF and must receive pre-approval prior to engaging in any work for the project. It is important that the required [Request for Advance Approval of an Independent Contractor](#) form be received by SFFM PRIOR to the consultant beginning work on the project. When completing the Advance Approval form, the PI must provide documentation or a justification supporting the selection process for the consultant. If the service provided is widely available by other vendors, then the request must go through a competitive selection process. Please contact [SFFM](#) if you need assistance in how to proceed with engaging Consultants.

Once the consultant is approved, a Purchase Order (PO) will be established for the consultant to invoice charges. All invoices for this consultant must be submitted using the established PO number.

### *Cost Transfers*

Sometimes a PI will discover that a cost was improperly charged to an account and will need to transfer the cost to the appropriate account. ALL cost transfers must be submitted on the [Cost Transfer Form](#) with an appropriate justification. The justification must include:

- A reason for the transfer
- A description of why the cost is appropriate for the new account that is being charged
- An explanation why the new award wasn't charged in the appropriate timeframe
- Cost transfers more than 90 days old will be considered on a case by cases basis and only with proper justification. SFFM reserves the right to reject any cost transfer request which places the University at risk for an audit finding or disallowance.

Please keep in mind that certain cost transfers are suspect by their very nature and are to be avoided whenever possible. These include:

1. Transfers to or between sponsored awards
2. Transfers that are late (greater than 90 days after discovery of the error)
3. Transfers to a project occurring at the end of the project, thereby giving the appearance of utilizing funds inappropriately
4. Transfers with an inadequate explanation
5. Transfers between projects that clear an overrun on one of the projects

### *Conflict of Interest*

Unless specifically pre-approved in writing by the sponsoring agency, a PI is prohibited from hiring family members (and others defined to create either a real or perceived conflict of interest) to work on his/her projects. Family members will not receive approval from either SFFM as consultant or [Sponsored Funds Personnel](#) as employees to be paid using sponsored funds.

### *Sub-awards*

Occasionally, sponsored awards will have sub-awards/sub-contracts to other agencies, institutions, or individuals. Each sub-award is given its own PTA (typically it is only the task number that is different from the primary PTA) and a PO is created based upon a signed contract. The PI is responsible for verifying that all deliverables associated with a given invoice from the sub-contractor have been delivered according to the contract. SFFM will send a copy of the invoice and a memo to the PI requesting review and approval of the invoice. Once the PI is satisfied that the invoice is accurate, he/she must sign the memo and return it to SFFM for processing of the payment.

## **Office of Purchasing & Contracts**

The [Office of Purchasing & Contracts](#) provides procurement and contractual services for commodities, technical services and professional services for sponsored programs necessary for the conduct of the award. The office endeavors to find the best prices for items based upon available institutional and state negotiated discounts. All requests for goods must be routed through Purchasing & Contracts using the standard [Purchase Requisition form](#). The Purchasing and Contract Office is responsible to ensure that all relevant Federal, State, University, Research Foundation and sponsor regulations are followed. [Click here](#) for more information on the dollar thresholds and corresponding procurement action required. The Office of Purchasing & Contracts negotiates contracts for work to be performed on grants and contracts. They can assist in sending out Requests for Proposals and/or Bids and can identify appropriate vendors for specific procurements.

Any printing work that will use the University's logo must be pre-approved by the Office of Purchasing and Contracts. Information on the use of logos can be found by [clicking here](#).

Also, any clothing items or other apparel that are purchased must be provided by vendors that meet strict anti-sweat shop certification. The Purchasing office enforces such regulations and will not authorize vendors that do not meet the specified criteria. More information can be found by [clicking here](#).

The Accounting office must be notified when procured items have been received. In the case of computers, they must have an inventory control tag placed on them before they can be used and they must be properly configured by IT technical support. To document receipt of items received, an [AP-102 form](#) must be filled out online. This documentation authorizes the Accounting Office to pay the invoice once it is received from the vendor. Until the AP-102 is submitted, the Accounting Office will not pay the vendor because they have no other way of knowing if the merchandise has arrived in good order. Failure to send an AP-102 in a timely manner can jeopardize the entire University's ability to contract services from a vendor due to late payments.

Equipment with a unit cost >\$500.00 must be marked with an identification tag affixed by the Office of Equipment Management staff. A "[New Asset Receipt Form](#)" must be completed and returned to the Office of Equipment Management (OEM). OEM staff will determine the appropriate type of tag and, after inspection of the asset, will affix the tag to the equipment.

In essence the purchasing process can be summed up as follows:

- PI submits a Purchase Requisition (PR).
- The Office of Purchasing & Contracts determines the process required depending on the value and type of commodity.
- Once a procurement process is followed, a vendor is identified and pricing negotiated, a Purchase Order (PO) is issued to the vendor.
- The PI receives the goods and then submits an AP-102 online to SFFM.
- SFFM uses the AP-102 authorization to pay the invoice.

- For equipment >\$500.00, the PI submits a completed New Asset Receipt Form to the OEM and OEM tags the asset.

## **Compliance Issues**

### *OMB Circulars*

Since grant money comes from outside sponsors, the RF is obligated to be in compliance with sponsor regulations in addition to RF policy. In the case of Federal awards, we are bound by the [Office of Management and Budget](#) (OMB)'s circulars [A-21](#) and [A-110](#). These Federal requirements apply to all federally-funded grants, regardless of the specific agency within the government that sponsors a particular grant. Non-Federal sponsors often have their own unique regulations that must be adhered to in order to be in compliance with the terms and conditions of the grant. The PI is responsible for being aware of these regulations and only expending grant funds for allowable costs.

### *Budget*

One of the primary compliance issues that PIs frequently face is adherence to the established budget. Some sponsors give the RF what is known as "expanded authorities." This expanded authority allows the RF to make budgetary changes up to X% of the overall budget. This authority, however, is the exception rather than the rule. PIs are responsible for working with their [OSP Research Administrator](#) to secure advance permission, in writing, for any proposed budgetary changes in order to be in compliance.

### *Audits and Site Visits*

Sponsors, by virtue of the fact that they are investing money in a grant project, are entitled to perform audits of all aspects of the grant (financial and programmatic). These audits may also be accompanied by site visits where the sponsor sends an individual or team to get a first-hand look at grant activity to ensure that it is in compliance with the sponsor's regulations and the scope of work outlined in the funded proposal. The RF is obligated to comply with any requests for audits and/or site visits. The PI will need to notify his/her [OSP Research Administrator](#) as soon as he/she is informed that an audit or site visit will be taking place. The RF will provide appropriate personnel and resources to the sponsoring agency to demonstrate compliance.

## **Reports**

Financial, technical, and progress reports are often required by sponsors on a fixed schedule throughout the lifetime of an award. These reports provide the sponsor with assurance that project activities are moving forward according to the terms of the agreement. SFFM is responsible for providing the official financial reports associated with the award. PIs are responsible for making sure that all progress reports are submitted to the sponsor on time and that copies of all reports, along with the transmittal letter or E-mail is on file with the Office for Sponsored Programs. Failure to provide the required reports can cause funding delays in multi-year awards, early termination of the award by the sponsor, jeopardize the University's ability to apply for any future awards from the sponsor, and delay sponsor payments to the RF.

## **Award Extensions**

Sometimes a project cannot be completed in the agreed-upon timeframe. In this case, the PI may need to request a no-cost extension to allow for time to finish the work. No-cost extensions usually must include a projected budget that provides a spending plan for any unused funds. Requests for no-cost extensions must be coordinated with your [OSP Research Administrator](#) and should be done several months in advance of the award's termination date.

## **Final Close-out**

Once the award period officially ends, each sponsor establishes its own deadlines for the submission of final financial and technical reports, as well as final invoices. Before SFFM will provide the final financial reports, the PI needs to be sure that all encumbrances have been paid and that there are no outstanding charges against the award. SFFM will contact the PI to ensure that all expenses are paid. Once the PI has certified that all financial obligations have been met, SFFM will close out the account and process final financial reports.

Unexpended funds from a cost-reimbursement award typically must be returned to the sponsor. Any charges discovered after the PI certifies closure become the PI's responsibility to pay. Unexpended direct costs from a fixed-price contract typically can be transferred to a fixed price balance account. If the PI for the fixed price contract that is being closed out does not already have a fixed price balance account, the Office for Sponsored Programs will set up a new fixed price balance account in his or her name. This transfer will be coordinated with SFFM, as the SFFM staff will need to transfer a portion of the cash credited to the fixed price contract to the fixed price balance account.

If a sponsor requires other close out documentation such as: Assignment and Release Forms, completed by SFFM; Property Reports, completed by OEM (within the Office of Purchasing and Contracts; Patent and Invention reports, completed by OSP; Final Technical or Progress Reports, completed by the PI; and documentation regarding the conduct and/or submission of A-133 reports, which are completed by the Audit Department at RF Central, the submission of these reports is generally coordinated by the OSP Research Administrator. Once all of the income due on a particular award has been received, SFFM will mark the award "CLOSED" in the RF's Oracle financial management system

## **Acknowledgement**

The Research Administration Offices gratefully acknowledge the original preparation of this document by Nathan Wright, Assistant Director for Finance & Administration, Albany Institute for Research in Education. Nathan's desire to prepare these faculty guidelines was the basis for further input by the administrators responsible for providing assistance to the University at Albany research community.

## **Helpful Links for Spending Grant Money**

### **[Sponsored Funds Financial Management](#)**

All accounting-related tasks (travel reimbursement, payments, etc.)

### **[SF Personnel/New Employee Forms](#)**

All human resource issues (appointing all RF-paid individuals, payroll information, etc.)

### **[Government Per Diem Rates](#)**

Official rates for travel to all domestic and international locations. Standard used by the RF for all travel payments

### **[Purchasing](#)**

Procurement of all commodities, services, purchase requisitions, contracts, etc.

### **[AP-102 Form](#)**

Used to report receipt of items from a Purchase Order. Form must be completed online before payment will be made to the vendor.

On-line access for purchase of office supplies, industrial commodities, letterhead, business cards, envelopes

Contact [Rachel Mack](#) via email to establish an account for the award

### **[PI Award Interface](#)**

Access form available from SF Financial Management forms link