



Hebrew SeniorLife Administrative Policy & Procedure

Policy Title	Management of Non-Marcus Institute Sponsored Awards
Responsible Departments:	Hinda and Arthur Marcus Institute for Aging Research; Legal & Compliance Department; and Fiscal Department
Original Effective Date:	08/01/2019
New Effective Date:	03/12/2024
Last Approved Date:	02/28/2024
Supersedes:	05/16/2022
Approved By:	<p><i>Kathryn Tasker</i> Kathy Tasker, Chief Sponsored Awards Officer</p> <p><i>Rachael Lee</i> General Counsel and Chief Compliance Officer</p> <p><i>Jim Hart</i> Jim Hart, Chief Financial Officer</p>

I. PURPOSE:

The purpose of this policy is to provide Hebrew SeniorLife (HSL) leadership and non-Marcus Institute staff policies and procedures to ensure compliance and proper management of sponsored awards. HSL departments are accountable for following sponsored award policies and procedures.

II. SCOPE:

This policy applies to all HSL staff (exclusive of the Marcus Institute staff).

III. POLICY:

HSL recognizes that sponsored awards provide significant resources to enhance HSL’s ability to provide programs and services that align with HSL’s strategic plans.

IV. PROCEDURES:

HSL’s Development Department, Sponsored Awards Administration (housed in Marcus), Legal & Compliance Department, and Fiscal Department work to support the development, submission, and management of sponsored awards from all external funders, including federal, state, local agencies, foundations, individuals and corporations. Sponsored awards differ from gifts/donations and follow different policies and procedures. To determine if a funding opportunity is a sponsored award, the staff member seeking the funding should review HSL’s Sponsored Award Distinction Policy (available on the HUB or by request from the Development Department) and then consult with the Senior Director, Institutional Giving, Digital Fundraising and Special Events (referred to throughout as “Senior Director, Institutional Giving”), the Chief Sponsored Awards Officer, and/or the General Counsel & Chief Compliance Officer for additional guidance and clarification.

The following steps apply unless/until it has been determined by the Chief Sponsored Awards Officer that a particular funding opportunity is NOT a sponsored award. Failure to follow these steps may jeopardize acceptance of an award.

A. Application Preparation (Note – Sponsored award budget approval requires significant advance planning – please see Items 7-8 below for additional detail.)

1. Sponsored awards should only be pursued when they directly relate to previously approved HSL strategic initiatives.
2. All Principal Investigators (PIs – i.e. the HSL staff member who is managing the sponsored award and sponsored award deliverables) must receive approval to pursue the funding opportunity from the Senior Leadership Team (SLT) member responsible for the business line/department that the funding would benefit prior to preparing and submitting any materials for a sponsored award application. Non-Marcus PIs must be a member of HSL's Senior Staff.
3. The PI must then work with the Senior Director, Institutional Giving (and the appropriate finance director) to complete the proposal tracking forms/materials and budget prior to submitting an application and/or responding to a Request for Proposal (RFP). The Senior Director, Institutional Giving sends completed, signed tracking forms and materials to Sponsored Awards Administration/Legal & Compliance before any application materials are submitted to the funder. At that time, Legal & Compliance also provides to Sponsored Awards Administration the most up-to-date Conflict of Interest (COI) disclosure(s) on file for the PI or any other Senior Staff-level HSL employee listed on the proposal tracking form.
4. Sponsored Awards Administration and Legal & Compliance will review the materials and notify the Senior Director, Institutional Giving of their approval or any concerns. Once the materials are fully approved, the Senior Director, Institutional Giving coordinates as needed with the PI to submit the application.
5. As soon as the application is submitted, final copies of the application materials must be distributed to
 - a. Sponsored Awards Administration
 - b. Legal & Compliance
 - c. SLT member
 - d. Finance director
 - e. Senior Director, Institutional Giving
6. Sponsored awards should be applied for using the Hebrew Rehabilitation Center entity or the Hebrew SeniorLife, Inc. entity unless use of a different HSL entity is approved in advance by HSL's General Counsel & Chief Compliance Officer, Chief Sponsored Awards Officer, and Vice President of Finance, Healthcare Services.
7. All sponsored award applications that involve a budget must be communicated with the appropriate grant manager in Sponsored Awards Administration and the appropriate finance director for review and approval at least 3 weeks prior to the application due date. If state or federal flow-through dollars are possible, the grant manager needs to be advised at least 6 weeks prior to the application due date to identify any management issues that may prohibit the use of the funds if awarded.
8. All sponsored award budget submissions that include allocations for staff salary must include HSL's federally negotiated fringe rate, currently 27.5% through 09/30/2026. When a federal sponsored award allows Indirect costs to be charged, the federal negotiated rate must be used (48% Non-Marcus Sponsored Awards and 59% for Marcus Sponsored Awards).

B. Post Award Set up and Management of a Sponsored Award

Sponsored Awards Administration (housed in Marcus) manages all sponsored awards for which general ledger access is available (and at present, general ledger access is only available when awards are administered out of Hebrew Rehabilitation Center or Hebrew SeniorLife, Inc.). In other cases, the sponsored award must be managed by the applicable finance director in conjunction with the PI, and in compliance with HSL's sponsored awards management policies and procedures. Sponsored Awards Administration will maintain all policies related to sponsored awards management and shall distribute them to all finance managers/directors, PIs, the Legal & Compliance Department, and the Vice President of Finance, Healthcare Services. Any requested deviations or adjustments to such procedures must be approved in writing in advance by the Chief Sponsored Awards Officer and the CFO.

1. Upon receiving notice that funding is being awarded, the PI or Senior Director, Institutional Giving must forward the relevant sponsored award agreement(s) to Sponsored Awards Administration for review and approval. Once Sponsored Awards Administration has approved, the PI or Director, Institutional Giving must submit the agreement(s) to the Legal & Compliance Department for review and approval prior to signing. All sponsored award agreements must be signed by either:
 - a) President & CEO;
 - b) Chief Sponsored Awards Officer
 - c) CFO

Any other signatories must be approved in advance by HSL's General Counsel and Chief Compliance Officer.

2. The PI should retain a copy of the fully signed agreement(s) in their files, and also circulate copies to Sponsored Awards Administration and Legal & Compliance. All sponsored award agreements managed by Sponsored Awards Administration will be subject to inclusion of the following language: *Please make checks payable to Hebrew Rehabilitation Center, c/o Hebrew SeniorLife and mailed directly to the following address:*

*Hebrew Rehabilitation Center, c/o Hebrew SeniorLife
Attention: Naysa Mejia, Marcus Institute Grant Accountant
1200 Centre Street
Boston, MA 02131*

- a. As noted in the **Summary of Responsibilities**, below, for all sponsored awards managed by Sponsored Awards Administration, every award payment, vendor payment, and reimbursement must be processed through Sponsored Awards Administration. All payments must comply with HSL's sponsored award policies and procedures. Vendors with questions regarding payment should be directed to the Chief Sponsored Awards Officer.
3. Any overspending that occurs on a sponsored award account must be covered by the PI's home department/site.

Note - if as part of any of the above steps, Sponsored Awards Administration determines that the funds do not constitute a sponsored award, Sponsored Awards Administration's involvement is no longer required and the process is managed by Development, the PI and the financial operational leadership from that point forward. The award agreement or letter should still be submitted to the Legal & Compliance Department for review, and copies of final signed letters/agreements should still be provided to the Legal & Compliance Department.

C. Summary of Responsibilities

Senior Director, Institutional Giving:

1. Oversee the proposal development and submission of all non-Marcus sponsored awards for HSL, including all sponsored awards where HSL is not the primary grant applicant (i.e., subcontracts/sub-awards).
2. Coordinate and review matters, as necessary, with various HSL departments/business lines that are involved in sponsored award administration and compliance, including PIs, Sponsored Awards Administration, Fiscal, and Legal & Compliance. Gather completed tracking forms and proposals/budgets for appropriate distribution and review.
3. Inform all non-Marcus PIs of the policies and procedures relating to the solicitation, acceptance, and stewardship of non-Marcus Institute sponsored awards.
4. Oversee stewardship of non-Marcus Institute sponsored awards, including working with PIs to ensure non-financial sponsored award reporting requirements are met and potential changes/revisions are communicated and reviewed by the grant manager in Sponsored Awards Administration before a change is requested to the granting agency. Ensure that PIs understand that nothing can be changed until the granting agency approves the request in writing.

Sponsored Awards Administration (housed in Marcus):

For ALL sponsored awards:

1. Review completed proposal tracking forms and proposals/budgets as well as funding agreements within one month of receipt.
2. Serve as the centralized resource for questions regarding the administration, compliance, terms and restrictions of a sponsored award.
3. Provide updated copies of sponsored award management policies and procedures to finance directors involved in administering sponsored awards.

For sponsored awards managed within entities where general ledger access is available (currently limited to Hebrew Rehabilitation Center or Hebrew SeniorLife, Inc.):

1. Administrative oversight of sponsored awards, including working with PIs and Vice President of Finance, Healthcare Services to ensure awards are managed and spent in accordance with specific sponsored award financial policies and in a manner satisfactory for audit purposes.
2. Set up accounts and communicate account information to PIs. Process sponsored award payments, vendor payments and reimbursements (for example, invoices for activities completed as part of sponsored award requirements) in accordance with HSL's Reimbursement, Purchasing and Accounts Payable Policy & Procedures for sponsored awards.
3. Report sponsored award fund balances to PIs on a monthly basis.
4. Prepare all financial reports utilizing the general ledger and required back up documentation to comply with financial cost accounting standards for financial reporting.

Principal Investigators (PIs):

1. Project Management and budget oversight of sponsored awards, including coordinating with the Senior Director, Institutional Giving to complete proposal tracking forms and an accurate budget for the work to be supported at the time of application, and ensuring sponsored award activities are completed in accordance with the sponsored award budget.
2. Notify Sponsored Awards Administration and the Senior Director, Institutional Giving in a timely manner if they reasonably believe that
 - a. Sponsored award may require an extension or other significant changes to the award period;

- b. Sponsored awards may require a budget revision; and/or
 - c. Sponsored award funds that are unspent may be returned to the granting agency.
3. Work with the Senior Director, Institutional Giving to ensure sponsored award non-financial reporting requirements are met, including submitting a copy of any progress reports and/or other relevant funder communication to Sponsored Awards Administration.
 4. Submit requests for grant reimbursements (i.e., paying of invoices) to Sponsored Awards Administration in a timely manner, in accordance with HSL's Reimbursement, Purchasing and Accounts Payable Policy & Procedures for sponsored awards.
 5. The SLT member must be informed by the PI of all relevant details regarding the sponsored award and where relevant folders and documentation are stored on shared servers. The SLT member and the PI must both have access to the sponsored award documentation.

Vice President of Finance, Healthcare Services (or other finance director, if sponsored award is not administered out of Hebrew Rehabilitation Center or Hebrew SeniorLife, Inc.):

1. Work with PIs and Sponsored Awards Administration to ensure sponsored awards are managed and spent in accordance with HSL and specific sponsored award financial policies and procedures.
2. Monitor sponsored award budgets against PI's home department budget to ensure that funds are not falling into deficit and/or are not overspent.
3. If not a sponsored award, ensure financial reports to donors tie out to the general ledger.

General Counsel and Chief Compliance Officer (or designee):

1. Review completed proposal tracking forms, application materials and proposed budgets, and provide any completed COI disclosures for any named individuals.
2. Advise on and approve terms and conditions within sponsored award agreements
3. Advise on legal and compliance risks and benefits of utilizing different entities within HSL for administration of specific awards.