



Arecibo Observatory

Office of the Director

SUBJECT: Governance in transaction-level actions for budget	Effective Date: 04-30-2020	Policy Number: AO-POBPE08
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	Responsible Authority: Director of the Arecibo Observatory	

DATE OF INITIAL ADOPTION AND EFFECTIVE DATE: April 30, 2020

APPLICABILITY/ACCOUNTABILITY

This policy applies to all AO Staff processing transaction thru UCF.

GENERAL POLICY

Establish procedures that govern transaction actions for budget evaluation at AO level

DEFINITIONS

1. **AO staff:** all employees appointed to perform any job at Arecibo Observatory site.
2. **Budget:** the financial plan for the project or program that the Federal awarding agency or pass-through entity approves during the Federal award process or in subsequent amendments to the Federal award.
3. **Major Transaction:** any transaction over \$75,000
4. **Transaction actions:** are actions incurred with the objectives to buy products/services to support the AO business activities.

POLICY STATEMENT

The Arecibo Observatory (AO) will follow applicable institution, sponsoring agency, state, and federal guidelines to process any transaction action. All transactions will be subject to validation of fund availability and allowability prior approvals of requisitions, independently of method of acquisition and payment.

PROCEDURES

1. The Scientific Operations Coordinator will be the primary contact at AO level to support the validation of funds availability and allowability.
2. AO Staff incurring in an action to buy any product or services to support AO business activities thru UCF will complete all required documentation and will contact Scientific Operations Coordinator.
3. The Scientific Operations Coordinator will be responsible to verify funds availability and account to charge prior any transaction process. To exercise this verification, the Pre-Award Specialist/Post award Manager at FSI will be contact by email and will document the response.
4. In cases where unavailable funds result, Pre-Award Specialist/Post Award Manager at FSI will be responsible to identify possible transfer to cover the transaction and get approval from PI/Site Director as applicable prior to requisition approval.
5. The PI can delegate the transaction approval of, for example: budget transfers, budget approvals, monitoring of daily expenditures transactions following UCF procedures.
6. The Site Director will be responsible to approve any transaction action by delegation.
7. The PI will be responsible to approve all major transactions.
8. The PI and the Site Director will be responsible to review, in a monthly basis, financial reports with the objective to identify any transaction misplaced, action or future action needed that can be result in a negative budgetary impact.
9. The PI and Site Director will be responsible to conduct a monthly financial meeting to discuss any variance between budget and expenditures in order to revise, develop new strategies and stablish directions in daily operations.
10. The PI will be responsible to communicate NSF any major situation that arises in the daily operations no considerate it in the budget.

CONTACTS

- Principal Investigator, ext. 212, 267
- Director of the Arecibo Observatory, ext. 212
- Business Operations Team, exts. 294, 219
- Business Manager, ext 325
- Scientist Operations Coordinator,

REFERENCES

UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

<https://www.govinfo.gov/content/pkg/CFR-2014-title2-vol1/pdf/CFR-2014-title2-vol1-part200.pdf>

Proposal and Award Policies and Procedures Guide (PAPPG)

https://www.nsf.gov/publications/pub_summ.jsp?ods_key=pappg

Federal Travel regulation

<https://www.gsa.gov/policy-regulations/regulations/federal-travel-regulation-fts>

NSF Large Facilities Manual

<https://www.nsf.gov/pubs/2017/nsf17066/nsf17066.pdf>

AO-BPE08 Procedures that govern transaction levels actions

INITIATING AUTHORITY

Director of the Arecibo Observatory

POLICY APPROVAL

(For use by the Office of the Director)

Policy Number: AO-POBE08 Governance in transaction-level actions for budget

Initiating Authority: _____

Date: _____

Principal Investigator: _____

Date: _____