



Arecibo Observatory

Office of the Director

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| SUBJECT: Arecibo Observatory Compliance Oversight | Effective Date: 04-30-2020 | Policy Number: AO-POAM15 |
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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 and procedure applies to all personnel at the Arecibo Observatory.

GENERAL POLICY

The Arecibo Observatory adheres to Federal agency award terms and conditions, OMB's Uniform Guidance regulations, Florida State statutes, and University policies, procedures and guidelines.

POLICY STATEMENT

Identification or allegations of non-compliance should be brought to the attention of the employee's immediate supervisor to include questionable cost assignments, inappropriate procurement methods, non-verified time and effort certification, questionable cost transfer assignments, inappropriate purchase or use of property, unapproved or unallowed travel, engagement with non-disclosed and un-approved outside activity/conflicts of interest, not following Environmental Health and Safety procedures, not adhering to proper academic and research ethical standards, and any other related non-compliant actions.

The employee supervisor will take appropriate action and or notify their supervisor of the non-compliance. Employees can also report a finding or file an allegation through the University Integrity Line (Link) (number).

PROCEDURES

Arecibo Observatory Internal Control Procedures

The Office of Research has instituted compliance evaluation and monitoring processes related to allowable costs, personnel assignments, time and effort certification, property controls, subrecipient monitoring, travel, program income, proposal review, award set-up, award management and close-out.

The Office of Research teams with designated Arecibo Observatory departments/offices to implement monitoring and compliance evaluation processes. Guidelines applicable to Arecibo Observatory employees have been created to ensure internal controls over compliance are instituted to include time and effort certification, conflict of interest, research misconduct, subrecipient monitoring and allowable costs.

The Office of Research teams with University Audit on an annual basis to evaluate and identify potential gaps and weaknesses in internal controls. Findings are provided to Arecibo Observatory management with requirements for corrective action plans and due dates.

Employees

Arecibo Observatory employees are required to follow university policies and procedures and Office of Research guidelines as outlined.

Principal Investigators

Principal Investigators and key employees are responsible for monitoring their research and service programs as outlined in the sponsored award. Cost assignments, effort certification, equipment purchases, travel, subcontract monitoring, and other related transactions are the responsibility of the Principal Investigator. Principal Investigators and key employees are responsible for ensuring students and assigned employees follow all university policies, procedures and guidelines as written.

Arecibo Observatory Management

Arecibo Observatory Management is responsible for monitoring operational conditions and employee assignments. Management must monitor financial and administrative transactions to ensure internal controls over compliance meet Federal, State and university requirements.

Pre and Post Award Administration

Arecibo Observatory administration will monitor and evaluate proposal submissions by investigators. Florida Space Institute will ensure proposal documents are accurate and meet agency criteria and follow university policy. The Office of Research will evaluate Arecibo Observatory proposals prior to submitting to sponsors.

Arecibo Observatory administration will monitor and evaluate cost assignments and operations and maintenance transactions to ensure compliance. The Florida Space Institute administration will monitor Arecibo Observatory operational conditions on a regular basis to ensure internal controls are adhered to.

The Office of Research post-award office will ensure account set-up parameters are accurate and based on proper agency terms and conditions and university policy and procedures. The Post-award office will ensure cost assignments are reconciled to budget and invoice parameters are met. The Post-award office will coordinate close-out parameters with the Principal Investigator, Arecibo Administration, and FSI as required.

Office of Research Compliance

The Office of Research Compliance will perform cost assignment monitoring and assessment on a periodic basis throughout each fiscal year. Subrecipient monitoring will be performed annually assessing allowable costs, deliverables, and other risk factors affecting Arecibo Observatory operations.

The Office of Research Compliance Office monitors sponsored projects at regular intervals. Quarterly queries are generated for account codes deemed high risk or sensitive. Based upon those queries, Compliance will work with the Florida Space Institute (FSI) and Arecibo Observatory (AO) to review and document the allocability and allowability of their project expenditures that appear in those queries. In the event an incorrect account code was utilized, or the expenditures are not allowable, FSI/AO will prepare a journal to correct the account code or transfer the expenditure off the project. Compliance will also test program income recording and reporting, subcontract monitoring.

Florida Space Institute (FSI)

The Florida Space Institute management will monitor and evaluate Arecibo operations and administrative functions on a periodic basis throughout each fiscal year to ensure compliance over internal programs.

Vice President for Research

The Vice President's for Research Office will ensure FSI and Office of Research management is evaluating and monitoring operational conditions as prescribed under Federal agency terms and conditions, Florida Statutes, and university policy, procedures and guidelines.

CONTACTS

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Principal Investigator/Program Director, Ramon.Lugo@ucf.edu

INITIATING AUTHORITY

Director of the Arecibo Observatory

POLICY APPROVAL

(For use by the Office of the Director)

Policy Number: AO-POAM15 Arecibo Observatory Compliance Oversight

Initiating Authority: _____

Date: _____

Principal Investigator: _____

Date: _____