



## Equipment Policy for Contracts and Grants

August 2015

This policy implements Federal regulations 2 CFR 200.33 regarding property/equipment acquired through Contracts and Grants at CSUEB. This policy covers the processes related to acquisition/procurement, coding, inventory tracking, reporting and disposition of property for all external grants regardless of funding source. For that reason, Office of Research and Sponsored Programs (ORSP) works with the Property Control to track all equipment purchased through Contracts and Grants. The following procedure should be followed for equipment purchased by awards managed by ORSP.

### Definition of Equipment (2 CFR 200.33)

Tangible personal property (including information technology systems) having a useful life of more than one year and per-unit acquisition costs which equals or exceeds the lesser of the capitalization level established by CSUEB for financial purposes, or \$5,000. In cases where equipment is purchased using federal funds, the procurement standards set forth in 2 CFR 200.313 must be followed unless otherwise stated in the Federal agencies award guidelines.

### Scope

All awards are made to CSUEB/CSUEBF on behalf of the Principal Investigator (PI) or Program Director. Unless a statute specifically authorizes the Federal agency to vest title with CSUEB Foundation Inc. without further obligation to the Federal Government, and the Federal agency elects to do, the title for the equipment is a conditional title and is subject Federal requirements during the award period. Regardless whether Title or Conditional Title, the equipment acquired with grant funds vests with CSUEB/CSUEBF, not the Principal Investigator. Upon grant closeout, unless otherwise stated in the award terms and conditions, equipment vested with CSUEBF will automatically be transferred to CSUEB and be subject to use in accordance with university policy and procedures. The automatic transfer will occur upon the equipment receiving a university tag. For equipment purchased with Federal funds it must be transferred in accordance with Federal guidelines.

### Roles and Responsibilities

#### PI

For each item of equipment, at the time of delivery, PIs must ensure that equipment purchased has been tagged by Procurement with a CSUEBF tag. If the equipment has not been tagged then PIs should contact Property Control and notify ORSP as soon as possible.

#### ORSP

ORSP will enter the following information into purchase requisitions

1. Sponsor Name
2. Federal Award Identification Number
3. PI name and any other individual responsible for equipment use
4. Location of equipment,
5. Title vested information (title usually vests with CSUEBF unless special terms and conditions are applicable.)

## Property Control

The Property Control department with the help of ORSP will identify and record the following to be included with the equipment's property record:

- Title ownership
- Full identification (including model number, etc., to clearly specify the item).
- Total cost, including any taxes. If cost has been shared, indicate breakdown among sources of funds.
- University department and room location in which equipment is housed.
- Other departments that share use of the equipment.
- Names of faculty or staff personnel who can provide information about the equipment if requested by the auditors.
- Inventory number, if any.
- Federal Award Identification Number
- Use and Condition of property
- Disposition data

In addition, property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the FAIN), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

**Note:** Property records will be maintained and kept on file by Property Control and made available to ORSP upon request.

## **Transfer Of Principal Investigator to another organization**

CSUEB/CSUEBF is the legal entity to which a grant is awarded. When the Principal Investigator moves to another organization, the following options apply in the order listed:

- CSUEB/CSUEBF may request continuation of the project under the direction of an alternate PI. If the alternate PI is approved by the granting agency, the grant will continue and thus title to the equipment purchased under the grant will remain with CSUEB/CSUEBF.
- CSUEB/CSUEBF may relinquish its interests and rights in the grant to the PI's new organization. If the new organization is approved by the granting agency to continue the grant activity, then the grant will be awarded and any equipment purchased with grant funds and still needed for the grant project may be transferred to the new grantee organization, which would assume title. If CSUEB/CSUEBF does not voluntarily agree to relinquish equipment with the grant, the granting agency may require the transfer of the equipment.
- If an alternate Principal Investigator is not accepted by the granting agency (or no alternate is nominated), and CSUEB/CSUEBF refuses to relinquish its rights in the grant to the new awardee to continue the research), then the grant will be terminated. Title to the equipment will remain with CSUEB/CSUEBF, subject to disposition or use as

described below. A change of grantee may not take place where it will involve the transfer of a grant to or between foreign institutions or international organizations.

**Transfer of Assets to CSUEB after the end of a grant**

When the grant has been completed and all final reports have been filed, if the granting agency has allowed CSUEB/CSUEBF to keep the equipment purchased with the grant funds, the University's Property Control must be notified in writing from ORSP. This equipment will then become the property of the University and will be tagged with a CSUEB tag and recorded as such in the property record maintained by property control. CSUEB must use, manage and dispose of equipment acquired under a Federal award by the state in accordance with state laws and procedures.