The Catholic University of America’s (CUA) Post-Award Principal Investigator (PI) Handbook

Office of Sponsored Accounting

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WELCOME TO SPONSORED RESEARCH AT THE CATHOLIC UNIVERSITY OF AMERICA

Now that you have secured critical, external support for your research project, The Catholic University of America’s (CUA) Post-Award Principal Investigator (PI) Handbook will help provide guidance for administration of your award dollars. This Handbook gives an overview of your responsibilities as the award’s Principal Investigator (PI) on what is considered a “sponsored” award. CUA sponsors can be federal or non-federal. As many of our research dollars are from federal sources, we apply federal cost allowability, audit and administrative principles and regulations to all sponsored awards regardless of source. These principles and regulations are entirely contained in the federal Office of Management and Budget (OMB) Circulars A-21, A-110 and A-133. These OMB Circulars detail numerous responsibilities you have as the caretaker of federally-funded awards. The CUA Grants & Contracts policy (policies.cua.edu) details the responsibilities you have as caretaker of federal and non-federal awards. This Handbook provides a basic understanding of CUA and federal policies, processes and resources to support the administration of your CUA sponsored award(s) and will help you to avoid some common pitfalls and delays as you submit paperwork for processing. We look forward to helping you!

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The Role of the Principal Investigator (PI) in Post-Award Administration

The PI has sole responsibility for accomplishing the technical goals of the project. These technical goals must be accomplished in compliance with financial and administrative policies and regulations as provided by CUA and the sponsor. CUA’s default position is compliance with federal regulations for all sponsored awards, federal and non-federal. Although a PI may have support staff, whether research or administrative, to help them achieve their research objectives, it is always the PI’s ultimate responsibility to ensure that all activities and personnel on a project comply with all relevant policies and regulations. To ensure that other staff is working to appropriately support the sponsored award goals, the PI should meet with their respective administrative and research staff at least monthly to review research progress, direct expenses and budget availability for their sponsored awards.

The fundamental responsibilities of the PI at CUA during the post-award phase include:

- Executing the sponsored project as outlined in the award documents;
- Reviewing grant budgets and all expenditures at least monthly to assure their appropriateness;
- Authorizing only those expenditures that are reasonable and necessary to accomplish the project goals and are consistent with the sponsor’s terms and conditions;
• Spending no more than the amount authorized by the sponsor for the budget period and requesting any appropriate no-cost extension (NCE) well in advance of the Project End Date;

• Resolving any amount expended in excess of the award amount;

• Reporting project progress to the sponsor as scheduled and providing timely response to requests from Sponsored Accounting staff for any requested Effort Certifications, Progress Reports, Final Financial Reports (FFR), Grant Closeouts and any other documentation that may or may become necessary;

• Complying with all CUA Policies and procedures related to project management and personnel practices;

• Maintaining all supporting files and documentation for three (3) years beyond the end date of the award;

• Complying with all applicable sponsor rules, regulations and/or terms and conditions of the award;

• Ensuring that all expenses are allowable, allocable and applicable to the grant charged (See OMB Circular A-21, Section J). If unsure, call Sponsored Accounting;

• Supervising research staff assigned to the award;
• Procuring needed services and supplies to further the research goals of the award and in compliance with CUA policies and procedures;

• Approving subrecipient invoices quickly when requested by Sponsored Accounting;

• Completing all Progress and Technical Reports as such reports are neither reviewed nor monitored by Sponsored Accounting;

• Reviewing, at least monthly, grant financial summary (1Grant) and run the Drilldown tool to review specific financial activity;

• Reviewing weekly pcard software (ESP), completing needed reallocations and receipt uploads within the required timeframe; and

• Properly completing Cost Transfer Forms as needed and directed.
Key Terms

A-21 – OMB Circular that establishes cost principles for costs incurred by institutions of higher education under federally sponsored agreement.

A-110 – OMB Circular establishing administrative policies for fiscal management of grant awards in non-profit and higher education institutions.

A-133 – OMB Circular that defines auditing standards for administration of federal agreements.

Agreement – An understanding that codifies an exchange of money for services within a certain timeframe and under specific circumstances. For purposes here, agreements shall encompass all awards, grants, contracts, fixed-price agreements, and gifts with reporting requirements.

Allocable Cost – A cost is allocable to a particular cost objective (i.e., a specific function, grant project, service, department, or other activity) in accordance with the relative benefits received. A cost is allocable to a project where it is treated consistently with other costs incurred for the same purpose in like circumstances and:

1) Is incurred specifically for the award; or
2) Benefits more than one award on the condition that other work or supplies can be distributed (allocated) in reasonable and demonstrable proportion to the benefits received.
Allowable Cost – A cost incurred on an award must meet all of the following requirements in addition to OMB A-21:

1) Reasonable for the performance of the award;
2) Allocable;
3) Conforms with any limitations or exclusions set forth in the federal cost principles applicable to the organization incurring the cost or in the Notice of Grant Award (NOGA) as to types or amount of cost items;
4) Consistent with internal regulations, policies, and procedures that apply uniformly to both federally-funded and other activities of the organization;
5) Accorded consistent treatment;
6) Determined in accordance with generally accepted accounting principles (GAAP); and
7) Not included as a cost in any other federally-funded agreement unless such cost is allocated in a reasonable and demonstrable and justifiable proportion to each affected award.

Award – A grant, contract or other written agreement that provides some or all of the funding required for support of a specified research project at CUA.

Award Period – Dates assigned by the sponsor that provides a set period of time to spend awarded funds.

Business Manager – CUA staff member with budget authority over selected orgs.
Carryover – Unobligated and unexpended funds for which a no-cost extension may be requested in accordance with sponsor provisions and in their sole discretion.

Chartfield – Accounting field identifier used to ensure accurate labeling of financial transactions. There are six chartfields for a grant (see page XX).

Cost Principles – The rules set forth in applicable statutes, regulations, grantor instructions, OMB Circulars and generally accepted accounting principles (GAAP) used for determining allowability, reasonableness, and allocability of costs applicable to grants, contracts and other agreements.

Deficit – Any amount expended in excess of sponsor-authorized and/or funded amounts during an award period that must be covered/reimbursed by a CUA operating or reserve org.

Direct Cost – Costs that can be specifically identified with a particular activity within a sponsored project.

Encumbrance – Any money committed for the purchase of an item or service although the actual expense has yet to be paid awaiting shipment, delivery or occurrence.

Expenditure – Any money spent on salaries and fringe or used to purchase supplies, equipment or services.

Expanded Authority – Latitude granted to institutional grantees (e.g., CUA’s Sponsored Accounting Office) to take certain actions without specific and prior sponsoring agency approval.
F & A – Facilities and Administrative Costs (formerly indirect costs). On Federal Awards these general expenses include academic support, departmental administration, plant operations & maintenance and other “administrative” or institutional costs. F&A costs are those expenses that are incurred for common objectives and therefore cannot be identified readily and specifically applied or allocated to a particular sponsored project or any other institutional activity.

Federal Financial Report (FFR) – The FFR is filed as directed by award terms but is required of all federal awards and must be submitted to the appropriate entity no later than ninety (90) calendar days after the Project End Date. The FFR, usually federal, requires a complete and final reconciliation of all expenses, with any and all appropriate corrections, that have posted to the award. It is also the PI’s certification that all expenses were allocable, applicable and allowable on the award.

Final Invoice – The FFR equivalent for sponsors that are invoiced.

Fiscal Year – The CUA fiscal year is May 1 through April 30.

Funding Period – A sponsor assigned period in which award dollars are allotted in some portion of the total award. The Funding Period can be one (1) year or more, or as little as four (4) weeks in the case of conditional funding mechanisms. The Funding Period can match the Award Period but in a cautious funding environment, this condition is less likely the case. Although the Funding Period may be shorter, there is usually an Award Period in which to spend any and all allotted funds.

Grant Administrator – CUA faculty or staff member that has authority over the grant/award org.
Incremental Award – Additional funding allotted to an existing award. Also termed “increment,” “supplemental award” or “supplement” this amount can be part of or in addition to the original awarded amount.

Indirect Cost – Cost that are incurred for common objectives (overhead) and therefore cannot be readily and specifically identified with a particular sponsored project, an instructional activity, or any other institutional activity. Also referred to as “F&A Costs.”

No-Cost Extension (NCE) – An approved request and subsequent approval from the sponsor to extend the Project End Date to accommodate continued work on the award without additional funding. The PI must work with the Office of Sponsored Programs to obtain a NCE.

Notice of Grant Award (NOGA) – A letter from the sponsoring agency detailing the award amounts, terms and conditions that authorizes the start of work on the respective project.

Obligated Funds – Agency money that is known to be committed but is not yet spent.

Pre-Award Costs – Expenses incurred for the proposed project BEFORE the effective date of the award and before the NOGA is issued. The expenses are generally not allowed unless specifically authorized in writing by the sponsor.
Prior Approval – Authorization in writing by the sponsoring agency to permit a specific expense or type of expense BEFORE it is incurred or encumbered. Relocation expenses for research faculty are typically expenses that must have Prior Approval and must be specifically budgeted.

Project End Date – The last date for which expenses can be charged to an award. The accounting date for charges may be after the Project End Date but the services or supplies must have been provided to benefit the goals of the Project before the Project End Date.

Purchase Requisition – Form used to identify funding and specifications to issue a purchase orders for the acquisition of goods and services.

Record Retention – Electronic and paper records must be kept for sponsored awards for three (3) years AFTER the award’s end and submission of the FFR.

Subcontract – A formalized, cooperative agreement that defines a research relationship with another organization or entity.

Supplemental Award – See Incremental Award.

Unallowable Cost – A charge or expense not permissible under the rules of the sponsor or sponsoring agency. One example of an Unallowable Cost is the purchase of alcoholic beverages.

Unexpended Funds – Funds which are not spent during the life of the award.
Cost Compliance Rules

Highlights of OMB A-21 – Examples of Costs Allowable or Unallowable

The full OMB A-21 Policy is at: http://www.whitehouse.gov/omb/circulars_a021_2004#exa

Allowable (Section J., OMB A-21)

In general, any product, service or equipment specifically approved by the sponsor in the award notification/approved grant proposal is allowable. If such expense is not mentioned, A-21 and CUA policy together must be applied. One question that must be answered affirmatively is – does the expense fall within the active date of the award, within the available budget and does it directly further the stated research goals approved by the sponsor? Second, and only if allowable, is the expense allocable and applicable to the award?

Unallowable Expenses

Certain expenses are unallowable for reimbursement by the federal government. These expenses may be permitted under university policy and may be valid and appropriate for the project, but they cannot be claimed as direct or indirect costs of federally sponsored projects. It is important that all costs that are unallowable be classified as such, as failure to do so can have negative consequences for the university. The Office of Sponsored Accounting has full authority to request more information or reject the reimbursement of
a cost from an award if there is insufficient evidence to support cost allowability. If that is the case, the cost will need to be covered by a non-sponsored, departmental budget.

OMB Circular A-21 and other regulations define what is allowable and unallowable. Two general conditions define unallowable costs: 1) costs for an unallowable activity or 2) costs for an unallowable object.

Examples of specifically Unallowable Activities:

1. Organized fund raising;
2. Lobbying (not allowed on any type of CUA funds);
3. Commencement and Convocation;
4. General public relations and alumni activities;
5. Student intramural activities and clubs;
6. Defense or prosecution of criminal, civil, and administrative proceedings, including claims against the federal government; and
7. Other items specified in federal or sponsor regulations.
All expenses in support of these activities are unallowable and are generally recorded in separate organizations or accounts to ensure that the transactions are identified for reporting.

Examples of specifically Unallowable Costs:

1. Most advertising and recruitment costs;
2. Alcoholic beverages (itemized receipts required to ensure there is no alcohol on meal charges);
3. Entertainment;
4. Losses or overspending on another grant or contract;
5. Fines and penalties;
6. Promotional materials (employee morale items are allowable);
7. Moving costs if employee resigns within 12 months;
8. Certain types of travel costs (e.g., first class travel except for documented medical requirements);
9. Cash donations to other parties;
10. Memberships in civic, community or social organizations;
11. Goods and services for personal use of employees (e.g., automobiles);
12. Investment management costs;
13. Lobbying costs (not allowable using any type of CUA funds);
14. Housing and personal expenses of university officers; and
15. Any other items listed in the unallowable cost section of OMB Circular A-21.

All questions about allowability or the proper recording of expenses should be directed to the Office of Sponsored Accounting.
Award Budget and the 1Grant Report

One of the tools a PI most needs in grant administration is the 1Grant report generated from Cardinal Financials. The 1Grant report provides financial information for gauging the remainder of award dollars to accomplish project goals. Your grant budget is very much like a traditional checking account where money is “deposited” upon your notice of grant award (NOGA) or funding increment and is withdrawn when your expenses (salary, travel reimbursements, purchase requisitions, pcard charges, etc.) post to or “clear” your account.

The Cardinal Financials system is the central ledger (or holding account) for several feeder systems (e.g., HR/Payroll, Suntrust ESP/pcard, Accounts Payable payments) and just like your checking account may receive deposits or withdrawals from several sources and needs to be monitored and tracked. We are now encumbering, or reserving from award budgets, F&A costs for future salary expense to help keep better track of available funds. Please follow this link for a more thorough explanation of the 1Grant report.

**1Grant Report Sample**

The Catholic University of America
Report for Sponsored Projects

**EXPENSES**

<table>
<thead>
<tr>
<th>Account</th>
<th>Description</th>
<th>Actual</th>
<th>Expended</th>
<th>Budget</th>
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</thead>
<tbody>
<tr>
<td>Z001</td>
<td>Total Expenses</td>
<td>2100</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Salaries &amp; Wages</td>
<td>2100</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Z100-Benefits</td>
<td>2101</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Benefits of Indirect Costs</td>
<td>2501</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Indirect Cost</td>
<td>2501</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Z204-Other Gen'1 Exp</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Z201-Total Expenses</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Note: The numbers above are not real; they are for illustration purposes. For real data, please refer to the actual reports.

**For Sponsored Acctg USE ONLY**

- Total Expended: $12,345.67
- Total Collected from Sponsor: $9,876.54
- Balance Due (Excess Funds): $2,469.13
Chartfield

The chartfield contains data elements that allow Cardinal Financials to track and apply all award expense transactions to your specific award(s). One example of a grant’s chartfield is:

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Account  Fund  Organization  Program  Sub-Class  Project ID

The chartfield elements are determined by Sponsored Accounting using the NOGA and are established in Cardinal Financials at the time of your award. Chartfield elements are to be provided by the Principal Investigator and research staff for all transactions. The data elements are available by looking at the upper right hand corner of the 1Grant report. It is imperative that the correct and complete chartfield for each award be used for each expense transactions (including pcard charge reallocation) as failure to provide the correct chartfield will result in processing errors and delays and the likely return of documentation to the department.
Subrecipient Monitoring

The principal investigator (PI) has final responsibility for ensuring the validity and appropriateness of all activities performed in pursuit of a specific award’s goals. Therefore, it is the principal investigator’s responsibility to ensure that any work performed by a subrecipient is appropriate. A PI, or their designee, should review all subrecipient invoices thoroughly to ensure that all work is performed as stated and invoiced.

To pay a subrecipient invoice, the department should follow purchase order request and invoice payment procedures located at:

http://treasurer.cua.edu/business-services/Procurementservice.cfm

Cost Sharing

Some awards proposals suggest or require CUA to share in the cost of the solicited research. This share, known as a cost share, usually results from and is reflected as a contribution of CUA resources or a forfeiture of indirect charges against the award. However, the Office of Sponsored Programs with the concurrence of the Provost, must approve any such arrangements in advance.
Research Policies Applicable to Faculty

If you have questions about research policies, or if you cannot find a research policy, please contact the Associate Provost for Research at tel. (202) 319-5218.

Compensation from External Consulting

Sponsored Grants and Contracts

Procurement Card Policy

Protection of Human Subjects in Research

Conflicts of Commitment

Conflicts of Interest

Patent Policy

Research Misconduct

Copyright Ownership
All CUA Policies

http://policies.cua.edu

...and of particular importance to research administration are:

Grants and Contracts

CUA Official Travel Policy

Fraud and Financial Irregularities

Procurement Policy
Appointment Form (Faculty) or EDF (Staff)

Filling out an Appointment Form or an Employee Data Form (EDF) can be completed in 3 easy steps:

1. **Pull up a 1Grant Report.**
   - Check to make sure there is enough money to cover the salary in the salary line of the budget, in the available funds column, (Z100).
   - Repeat this step for Fringe Benefits, (Z101) and F&A or Indirect costs, (Z601).
   - If there is not enough money in these budget lines, funds may need to be moved from another budget line in accordance with sponsor rules and permissions. For example, some sponsors may not permit budget movements greater than 5% of the total program budget without specific agency approval. Send an email to a Grants Coordinator to request a Budget Amendment (http://treasurer.cua.edu/Sponsored/index.cfm), stating the budget line or lines you want to move money from, where you want the money moved and the amount you want moved.
   - By completing a budget amendment before the Appointment/EDF is sent out for signatures, you reduce the opportunity for delay as Sponsored Accounting reviews your submission.
   - If there are not enough funds to cover an Appointment/EDF but you know you will receive an increment soon, please do not send it out until you have been notified by
the Sponsored Programs Office. We cannot process an Appointment/EDF until we receive a “Notification of Increment of Award” from the Sponsored Programs Office.

2. Once you are sure that funds are available for the Appointment/EDF, it is time for Step 2.
   - From your 1Grant Report, check the end date of the grant to make sure the term of employment does not extend beyond the end date of the grant. It is important to fill in the start date and end date because salary will be calculated and paid based on the dates provided.
   - Complete the form including required signatures. Pay special attention to the position number and the Empl ID number to avoid delays within Human Resources and the Budget Office. You must complete the Chatfield information – Fund#, Org#, Class and Project ID on the form as referenced on the top, right-hand corner of the 1Grant Report.

3. Follow CUA procedures for routing of required signatures.
   - If you are the PI and this is your own Appointment, your Chair or Dean must sign the form. You cannot sign for yourself.
Travel

Common mistakes can be avoided by referring to the Travel Policy prior to submitting a reimbursement request. Reviewing these important points will be extremely helpful in avoiding delays of your reimbursement.

*Top Travel Issues*

- PI’s should make sure there are funds available in the travel budget of their grant prior to sending the travel reimbursement request. If no funds are available, they should “request a funds transfer” in writing and send it with the travel reimbursement request.

- Original, itemized receipts are required. Receipts/documentation must be organized, labeled, and legible. Original receipts must be taped or stapled to letter-sized paper (8.5"x11") so that when a copy is made all the receipts can be seen distinctly. For auditing purposes, one must
submit receipts, not just itineraries. The travel expense report form is found at http://treasurer.cua.edu/forms.cfm.

- If traveling outside of the US, calculate the amount spent in US dollars ($). Each receipt should have the amount spent in US dollars written next to the total. The expense report itself should only have US dollar amounts on it. The Sponsored Accounting Office uses http://www.oanda.com/currency/converter/. Attach a printout of the conversion to the travel expense form. Use the date the expense was incurred when determining the US value of foreign currency. If you use a different currency conversion site, the reimbursement amount may not match the request you have submitted.

- For travel by personal auto car, submit a Google map of the route with the number of miles traveled, and use the government’s per-mile rate for reimbursement located at the Travel link below. The Google Maps website will precisely calculate the destination mileage. Do not also submit fuel receipts, speeding or red light tickets, or repair bills for personal auto use. However, you should submit any toll receipts.

- There are two different ways to be reimbursed for meals, by reporting the actual expense of each meal or claiming per diem for each day of official travel. Traveler may choose either method, but must be consistent throughout the entire trip. For actual expense reimbursement, an original receipt is required for meals that are $10 or more. If the meal is
under $10, record the exact amount of each meal. A list of all meals priced at exactly $10 per meal will not be accepted per the policy. The preferred method is to use a meal per diem for each travel day. The rates for this can be found on the web at http://www.gsa.gov/portal/category/21287 for domestic rates and at http://aoprals.state.gov/web920/per_diem.asp for foreign rates. Indicate whether claiming actual expense reimbursement or per diem reimbursement by making the selection on the travel expense report form.

Current Travel Policy

http://policies.cua.edu/finance/finance/Travel/travel.cfm

Travel Expense Reports

Link to Travel Forms and Instructions
Procurement Card

The CUA procurement card policy is located at:

http://policies.cua.edu/finance/purchasing/Procurement-card/Full-Procure-Card.cfm

Related to sponsored awards, the cardholder must allocate charges by the monthly deadlines (typically by the 7th of the month however, cardholders should be reviewing, approving and reclassing charges on a weekly basis. The reclassed transaction will post to the chosen grant org. within a few days. In the rare case that charges not allocated by deadline they must be transferred by Cost Transfer Form with the required explanation. All expenses must “further the research goals of the award.” Additionally, all receipts must be uploaded to the SunTrust ESP system immediately. The availability of receipts for all transactions is an A-133 audit requirement. Cardholders that do not follow the procurement card policies and procedures may lose their card privileges.
Post-Award Management

Sponsored Accounting is responsible for submission of all external financial reports. Although Sponsored Accounting has the responsibility for timely submission of external financial reporting, the PI must certify the accuracy of what is reported. Please respond promptly when Sponsored Accounting contacts you regarding the accuracy and appropriateness of financial submissions. For federal awards, we will forward financial reports for your review within four to eight weeks after the award end date.

Frequently Asked Questions

Q. I checked my 1Grant report and do not have any funding left. Can I submit my travel reimbursement for travel within the grant period?

A. No, unless there is already an open purchase order for the travel that has encumbered award funds, the travel occurred within the award period, has occurred within the current fiscal year and the request is being submitted with 15 days of your travel and within 60 days of the grant expiration (or sooner if prescribed by your award).

Q. I checked my 1Grant report and see that I have money just not on the needed budget line.
A. Make sure you have reviewed your agency agreement to ensure that funds may be moved. Contact the Grant Coordinators by e-mail and request a budget amendment. They will also verify what lines may be moved and in what amounts.

Q. My Grant has expired. May I still submit a subcontractor’s invoice?

A. Yes, so long as the work was performed within the award period and the invoice is submitted AND paid within sixty (60) days of the award’s expiration. There can be unusual conditions for subcontracts and private awards so please check with Sponsored Accounting.

Q. My grant is about to expire and I have money remaining. Can I spend it?

A. Any and all expenses charged to an award must directly benefit the selected award. You cannot obligate any money after the expiration date. If obligated before the award’s expiration by University purchase order, and as long as such expenses further the research goals of the award, you may spend it. All money that leaves the grant must be encumbered or expensed prior to or on the award expiration date. You may request from the Office of Sponsored Programs, a no-cost extension but you must do so before the award expires. You must not spend any money beyond the end date until you have received specific notice from the Office of Sponsored Program that your extension has been granted.

Q. I received a notice that my pcard charges were in error. What should I do?
A. There are many reasons why this situation may occur. It may be that your charges were not reclassed or reclassed properly. It may be that they were reclassed but the org to which you moved them is underfunded or out of date. Also, errors may occur if the chartfields are not accurate or complete. Check your 1Grant report for the full chartfield and use the Suntrust ESP drop down menus as available. If you are not sure why the error has occurred after reviewing, please contact Sponsored Accounting.

Check back often – we will add other FAQ’s as they arise.