



Policy: Limitation on the Use of HRSA Funds	Policy No: SI.1
Policy Developer(s): Office of Sponsored Research	Original Date: May 18, 2018
Last Review Date:	Approval Date: October 17, 2019

I. POLICY: The Office of Sponsored Research (OSR) at John Carroll University (“the University”) will perform an annual review of the legislative mandates required for HRSA funding. This Policy Bulletin, ([Number 2018-04](#)), issued by the Office of Federal Assistance Management (OFAM), Division of Grants Policy (DGP), provides information on statutory provisions that limit the use of funds on HRSA grants and cooperative agreements for FY 2018. A full copy of the FY 2018 Policy Bulletin directly follows and is incorporated by reference into this policy. Legislative mandates remain in effect until a new federal appropriation bill is passed by Congressional action, setting a new list of requirements.

II. SCOPE: As a recipient of federal funding from Health Resources and Service Administration, a division of the U.S. Health and Human Services, the following John Carroll University Office of Sponsored Research (OSR) [Policies](#) and Procedures incorporate Legislative Mandates in Grants Management for Fiscal Year 2018.

- Accounting System for Sponsored Research Policy
- Annual Audit for Federally Sponsored Research Policy
- Bank Account Reconciliation Policy
- Cash Management for Federally Sponsored Programs Policy
- Cost Sharing on Sponsored Programs Policy
- Determining Allowability of Costs on Sponsored Programs Policy
- Distinguishing Between Subrecipients and Vendors or Contractors Policy
- Expenditure Analysis on Sponsored Programs Policy
- Facilities and Administrative (F&A) Costs for Sponsored Programs Policy
- Financial Conflict of Interest (FCOI) on Sponsored Programs Policy
- Mandatory Disclosures for Sponsored Programs Policy
- Procurement on Federally Sponsored Programs Programs Policy
- Program Income on Sponsored Programs Policy
- Property Management on Sponsored Programs Policy
- Purchasing Card (P-Card) Purchases on Sponsored Programs Policy
- Time and Effort Reporting for Sponsored Programs Policy
- Trafficking in Persons Policy
- Travel on Sponsored Programs Policy

III. PROCEDURES: Upon release of updated Legislative Mandates, OSR will review the bulletin and identify any changes from the previous fiscal year. The policies and procedures named above will be updated to incorporate any new or changed mandates that limit the use of HRSA funds on active awards at the University. The links in the CROSS REFERENCES sections will also be updated to direct to the current Policy Bulletin.

IV. CROSS REFERENCES:

- A.** [University Policies](#), including but not limited to
 - 1. Sponsored Research Policies
 - 2. Bank Account Reconciliation
- B.** Federal Regulations, Statement, and Mandates
 - 1. [HRSA Legislative Mandates in Grants Management for FY 2018](#)
 - 2. [HRSA Manage Your Grant](#)

This policy will next be reviewed five years from the date of last review.