

The purpose of this document is to outline tips for ensuring compliance when making purchases on federal awards in B2P. This document is meant to capture general compliance considerations based on federal regulations as well as Harvard Policies. Local Units and research administrators should review the terms and conditions of their awards before initiating purchases to ensure compliance with award requirements.

Sponsored Activity (fund range 100000-299999) requires “two-sets of eyes” for all amounts; therefore, if the Requestor is also a Level 1 Approver, the system will prevent self-approval. If there is no other Level 1 Approver, the requisition will move to the next Level that has an Approver assigned to it.

Vendor Justification Form

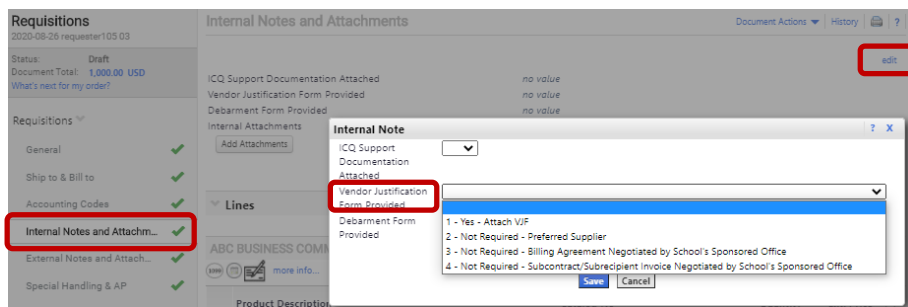
Who’s responsible:

	Complete Justification Form	Upload form	Ensure form is complete & accurate
Shopper or Requestor (PI Designee)	X	X	
Approver			X

What and when to upload this form: The vendor justification form is required to support the selection of the vendor. This is required for purchases over \$10,000 (\$35,000 effective January 1, 2021) using federal funds, cost share funds and expenses journalled to federal funds.

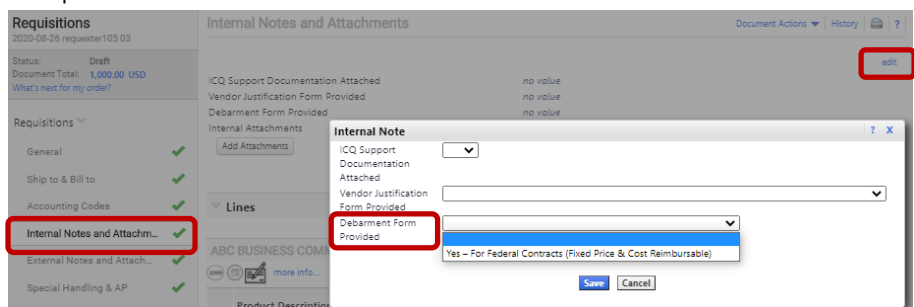
Key information: Refer to Harvard Procurement Policy [webpage](#). VJF lists exceptions in the dropdown (e.g. subcontracts) and if not completed it WILL allow you to submit through workflow but will get kicked back after the system identifies that one wasn’t completed.

Where to upload this form: Internal Notes and Attachments → click **edit** → select option. Then click **Add Attachments** to upload relevant form.



Debarment Form

- Who’s responsible:** Requestor
- What and when to complete this form:** This form is to ensure debarred vendors are not paid with federal funds. This form is automatically checked for most types of Federal funding instruments, but the form must be manually obtained and uploaded for purchases of \$25,000 (\$35,000 or more effective January 1, 2021) or more on a federal contract, cost share funds and expenses journalled to a federal contract.
- Key information:** Refer to Harvard Procurement Policy [webpage](#), Office for Sponsored Programs Procurement webpage for links on [how to find your funding instrument](#)
- Where to upload this form:** Internal Notes and Attachments → click **edit** → select option



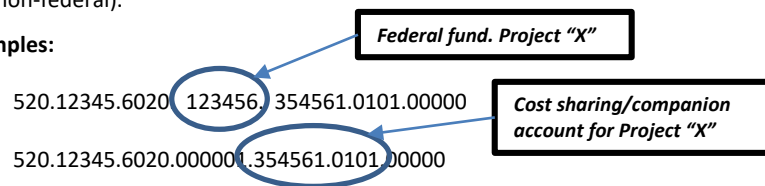
Subcontract Payments

- Who’s responsible:** Requestor
- What is it:** payments for invoices received for work performed on a subcontract agreement negotiation by a sponsored pre-award office.
- Considerations:** Sole source, debarment language must be included in subcontract agreement. No IDC can be recovered on subcontracts after the first \$25,000.
- Recommended approach:** To avoid rounding errors in B2P, split by **% of Price** and enter a percentage with four decimal points to pay subcontract invoices. Make the first \$25,000 of the payment a distinct line item charged to 8190. Refer to the second page of the [Checkout Process guide](#) for further information on how to apply splits. To avoid rounding errors, add a separate line and don’t use the split coding.
- Key information:** [Harvard’s Subrecipient Monitoring Policy](#).
- Supporting documentation:**
 - Subcontract agreement
 - Invoice
 - PI Approval of the invoice, documenting approval

Chart of Accounts

- **Who's responsible:** Requestor is responsible for charging the correct costing string for the purchase. The approver is responsible for reviewing the costing string before approving to ensure compliance with sponsor terms and conditions.
- **Considerations:** fund numbers starting with a "1" represent funding that comes from federal sponsors. Cost sharing (companion accounts) represent a cost paid by Harvard on a discretionary account that support research related to a sponsored award (federal and non-federal).

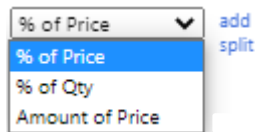
- **Examples:**



- **Key information/Resources:** Refer to Harvard Chart of Accounts [webpage](#), [Harvard Cost Sharing Policy](#). B2P validates CoA, but, due to the nature of activity codes, it cannot catch errors of fund/activity cross validations. Buy2Pay validation follows the same rule as Oracle Chart of Accounts Validator.

Splitting Across Chart of Accounts

If you are using Sponsored Activity, Subcontract Activity, or Asset Acquisitions we recommend you choose to split by **% of Price** and enter a percentage with **four decimal points specified** to ensure exact amounts and percentages are reflected in B2P and the Oracle general ledger.



It is not recommended to use the **Amount of Price** split as this may result in a difference in rounding between B2P and the Oracle general ledger. Refer to the second page of the [Checkout Process guide](#) for further information on how to apply splits.

Reporting

Part of ensuring sponsored compliance is ensuring separation of duties and requestors and approvers have delegation and business processes to verify orders placed are for necessary purchases in the interest of Harvard business and understand the terms and conditions of the funding sources used to make purchases.

B2P has reporting functionality to review the status of requisitions and the workflow of approvers. Helpful reports for research administrators may be: PO Summary report.

You can use the Vendor Justification Activity Report to review all activity on a sponsored fund.

Relevant Resources

- [B2P FAQs](#)
- [Harvard Procurement Policy](#)