$\frac{\text{UNIVERSITY of WASHINGTON}}{\text{COLLEGE OF THE ENVIRONMENT}}$

College of the Environment Equipment Compliance Procedures

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In order to comply with federal and state laws and regulations, the university is required to tag and inventory all capitalized equipment. As of July 1, 2016, the capitalization threshold is \$5,000. This threshold, and the procedures below, apply to both purchases and fabricated equipment.

The procedures described herein are meant to supplement university policy and provide guidance on processes within the College of the Environment. For specific details on the university's inventory procedures, see UW General Inventory Procedures Manual and Federal Agency Equipment.

Acquisition

The Unit Administrator or unit's delegated ARIBA procurement approvers are responsible for approving the <u>acquisition of equipment</u>. Procurement approvers can vary depending on budget type. Procurement approvers will ensure costs are appropriately distributed and will work with Unit Administrator or PI (if grant) to ensure necessary approvals from Federal, State or other authorities are secured.

Equipment expenses on grants

There may be sponsor or grant-specific considerations when charging equipment or <u>equipment fabrication</u> costs on sponsored research. It is the PI's responsibility to ensure equipment purchases or fabrications are per the sponsor-approved awarded budget and compliant with all institutional and sponsor policies. PIs should rarely purchase equipment near the end of the project. Project justification and sponsor approval for the purchase will be required in advance of purchase.

Ariba purchasing

Due to compliance regulations, equipment over \$5K or Machinery and Equipment (M&E) tax exempt should only be purchased through Ariba and should not be purchased using a ProCard.

Receiving

The Equipment Custodian (the custodian may be a PI if asset is on a grant) is responsible for receiving and ensuring the proper tagging of acquired equipment and federally owned non-capital property. The equipment custodian is responsible coordinate proper placement of equipment and federally owned non-capital property.

Tagging

Within 24 hours of receipt, the purchaser will email purchase documentation to the Equipment Custodian or PI (if grant) with a notification that the asset was received and needs to be <u>tagged</u>. The information should contain:

- Description
- Manufacturer
- Model

- Serial #
- End username
- Building / room number of where the equipment will be located
- Received date
- Ariba reference numbers
- Budget number

Within 3-7 days after receipt, the Equipment Custodian or PI (if grant) will ensure the asset is tagged and OASIS is updated with the information above.

Government furnished property

Assets owned by the Federal Government require both a UW inventory tag and <u>yellow</u> government property tag. Asset specific details (e.g. manufacturer, serial #, location, etc.) are maintained in OASIS. Federally owned property is categorized in OASIS as Title F.

Fabricated equipment

The PI fabricating the equipment is responsible for working with the unit administrator or designated Equipment Custodian to ensure eligible fabricated assets are entered into OASIS and property tagged.

Equipment insurance

The Administrator or PI (if grant) will determine if Equipment Insurance should be purchased. Refer to the Risk Management's <u>Equipment Insurance Getting Started Guide</u> for more information.

UW equipment insurance is available to departments, providing optional, low-cost coverage for owned, leased or borrowed equipment used for UW business. The university does not automatically provide insurance for equipment.

To incentivize the purchase of equipment insurance, the Dean's Office will cover 50% of the deductible for any losses and damages to equipment covered by the UW Equipment Insurance program. Details of this incentive program can be found in the College's Equipment Insurance Incentive Policy.

Request coverage https://risk.uw.edu/insure/EIS

Records

The Equipment Custodian or PI (if grant) is responsible to ensuring key information is entered into the UW inventory system (OASIS) and maintaining and updating current location information for equipment and federally owned non-capital property.

As part of a budget closeout or the departure of an equipment custodian or PI (if grant) the unit Administrator is responsible for ensuring OASIS is updated. In the future, Workday will only populate that field if the person listed is a present employee. Federal regulations do not require

that PI/custodian information to be part of an asset record (i.e., the OASIS record). The custodian field is for the unit's use to identify responsible individuals.

Periodic inventory review

During its quarterly review of OASIS budgets (see <u>Assessment</u>) the Dean's Office Finance and Administration staff will review new equipment in OASIS and check that all new capitalized equipment assets have been properly entered into OASIS.

Physical Inventory

The Unit Administrator or Unit's appointed Equipment Custodian or PI (if grant) is responsible for facilitating annual and biennial physical inventories of equipment and federally owned non-capital property, including the actual physical verification (and updating of OASIS where needed) of equipment and federally owned non-capital property.

The Unit Administrator approves the physical inventory for the unit(s).

Maintenance

The Unit's Equipment Custodian or PI (if grant) is responsible for ensuring proper and timely maintenance be performed on equipment and federally owned non-capital property.

Utilization

The Unit's Equipment Custodian or PI (if grant) is responsible for ensuring that equipment and federally owned non-capital property are being used for the purpose(s) for which they were acquired.

Disposition

The Unit's Equipment Custodian or PI (if grant) is responsible for identifying idle equipment and federally owned non-capital property that should be disposed.

Relocation/movement of asset(s)

The Equipment Custodian or PI ensures all approvals (e.g., federal) are secured and paperwork is processed (e.g., Form 1024) for disposals and relocation.

Surplus/disposal

The Equipment Custodian (or PI if grant) will ensure that equipment to be surplused is picked up by UW Surplus and all paperwork is processed (e.g., <u>Form 1024</u>). For federal property assets, see <u>Disposal of Equipment on Federal Awards</u>.

Lost or stolen equipment

The Equipment Custodian or PI (if grant) is responsible that reporting of lost/stolen equipment is reported to the Equipment Inventory office and in the case of federally owned non-capital property to funding agency as described by <u>WAC 236-48-198</u>. <u>Property Activity Request Form</u>

<u>1024</u> has a section for lost or stolen equipment. Stolen property should have a police case number. The University's insurance program does not cover lost or stolen property unless it is clearly the result of the University's negligence.

Assessment

The Unit Administrator, supported by the College of the Environment Dean's Office Finance and Administration (F&A) team, is responsible for ensuring compliance.

Quarterly reviews

Every quarter Dean's Office Finance and Administration (F&A) staff will pull a college wide inventory report from OASIS. During this quarterly review, the F&A staff will review:

- 1. New equipment to check if the item has been accurately entered into OASIS.
- 2. Budgets for validity (by checking status of budgets) and confirmation that the budget is in the correct organization.
 - a) If the budget is not valid, the F&A team will contact the unit to update the budget number in OASIS. Budget number must be associated with piece of equipment.
- 3. Grant Closeout Dates. The Dean's Office will review Grant and Contract budgets (prefix 61 thru 68) thru Grant Tracker for upcoming Final Action Date (FAD) or Grant Closeout date. If FAD is within 60 days, the Dean's Office will alert unit of upcoming budget close.
 - a) Generally, OSP notifies the EIO if a Final Property Report is required (most Federal awards list the reports required in the award document). This does not always happen so EIO recommends units add budget updates to the close out award process. If the award requires the Closeout Property Report, the procedure can be found here: https://finance.uw.edu/eio/closeout-property
- 4. In addition to reviewing new equipment in OASIS, the Dean's Office Finance and Administration staff will request documentation for a random selection of several assets across the College to ensure records are update to date, including custodian, location, tagging and utilization.

Equipment custodian/PI update in OASIS

The Unit Administrator or designated staff member is responsible for updating OASIS when an Equipment Custodian or PI moves from role.

IT equipment compliance

The Unit Administrator or designated staff member is responsible for IT Security Compliance for all IT equipment following <u>Administrative Policy Statement 2.6</u> and each unit must have a unit specific Information Security Plan that complies with APS 2.6. It is the unit's responsibility to ensure that all equipment complies with this security plan. The kind of equipment is easily identified in OASIS by a class code starting with 70xxxx.

Sub-award assessment

If applicable, the Unit Administrator or PI will review sub-awardee equipment purchases and fabrications to ensure they are per the sponsor-approved awarded budget and compliant with all institutional and sponsor policies.