

Management of Equipment Acquired Under Federal Agreements

POLICY

All equipment acquired under federal grants and contracts must be properly identified, recorded, maintained, and disposed of. The department chair, equipment coordinator, and principal investigator share responsibility for care, maintenance, safeguarding, and use of federal equipment in their custody.

Property Requirements

CFR

Such property is managed in accordance with Code of Federal Regulations 2 *CFR* 200.

FAR

Federal Acquisition Regulations (FAR) provide additional federal requirements for property management on contracts. NOTE: Most of the regulations used by the University are located in FAR Part 45.

To view the FAR, go to:

acquisition.gov/far/

DFAR

Defense Federal Acquisition Regulations (DFAR) provide additional requirements for property management on federal defense contracts.

To view the DFAR, go to:

acq.osd.mil/dpap/dars/dfarspgi/current/index.html

NASA Grants Handbook

NASA Grants Handbook sections 1260.130 through 1260.137 provide uniform standards governing management and disposition of property charged to projects supported by National Aeronautics and Space Administration (NASA) grants and cooperative agreements.

Award Conditions

Various funding agencies may reference other specific property management requirements in the award documents.

PROPERTY INVENTORY

Departments are to tag and inventory newly-acquired (i.e., purchased, leased, borrowed, or fabricated) equipment in accordance with procedures in *BPPM* 20.50.

PROPERTY REPORTING

Sponsored Programs Services (SPS), with the assistance of the department administrator or principal investigator, provides property reports in accordance with the award terms and governing federal regulations.

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Annual Property Reports

Department of Defense (DoD) Contracts

Department of Defense (DoD) Form 1662 is used to report government-furnished property and property acquired on DoD contracts.

Government-titled property held by the University under DoD contracts, regardless of value, must be reported annually by October 31. If WSU no longer holds property under a DoD contract, an annual report is not required unless held property was indicated in the previous annual report.

NASA Contracts

National Aeronautics and Space Administration Form 1018 is used to report government-furnished property and property acquired on NASA contracts.

Government-titled property held by the University under NASA contracts, regardless of value, must be reported annually by October 15. If WSU no longer holds property under a NASA contract, the University is required to submit an annual report indicating that no property is held.

DoD and NASA Grants and Cooperative Agreements

A listing of government-titled property held by the University under grants or cooperative agreements must be reported annually by October 31. If WSU no longer holds property under a grant or cooperative agreement, an annual report is not required unless held property was indicated in the previous annual report.

DoD Property Reports

Property reports for DoD grants and cooperative agreements other than contracts are to be submitted in narrative format by letter, fax, or e-mail to the DoD property administrator.

NASA Property Reports

Property reports for NASA grants and cooperative agreements other than contracts are to be submitted in narrative format by letter, fax, or e-mail to the government property administrator or DoD property administrator, the NASA Industrial Property Officer (IPO), and the NASA Deputy Chief Financial Officer (CFO).

Final Property Reports

DoD Contracts

Immediately upon termination or completion of a DoD contract, the University must perform and require each subcontractor to perform a physical inventory of all property acquired under the contract.

A final report on DoD Form 1662 must be submitted to the cognizant DoD agency immediately upon final disposition of all property acquired under the contract.

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NASA Contracts

A final report on NASA Form 1018 must be submitted to NASA within 30 days after disposition of all property acquired under the NASA contract.

DoD Grants and Cooperative Agreements

A report must be submitted to the cognizant DoD agency within 90 days after a grant or cooperative agreement is terminated.

Property reports for grants and cooperative agreements are to be submitted in narrative format by letter, fax, or e-mail to the cognizant DoD property administrator.

NASA Grants and Cooperative Agreements

A report must be submitted to NASA within 60 days after a grant or cooperative agreement is terminated.

Property reports for grants and cooperative agreements are to be submitted in narrative format by letter, fax, or e-mail to the government property administrator or DoD property administrator, the NASA Industrial Property Officer (IPO), and the NASA Deputy Chief Financial Officer (CFO).

PROPERTY CLOSEOUT

At award closeout equipment must be processed and reported in accordance with all of the following:

- 2 *CFR* 200.343 – Closeout
- FAR Part 45 - Government Property
- Any special terms and conditions included in the award
- Funding agency regulations/policies
- University requirements

University Requirements

Sponsored Programs Services takes the following actions to process and report government property at award closeout:

- For closeout of a DoD or NASA contract, Sponsored Programs Services completes a draft property report on an agency-designated form, e.g., DoD Form 1662, NASA Form 1018. See 40.13.2-3 for information concerning final reports.
- For closeout of a contract, grant, or cooperative agreement that does not require a specific agency form, SPS completes a draft property report using a spreadsheet format. The report is to include the following information:

- Manufacturer/description
- WSU tag number
- Model/serial number
- Date acquired
- Purchase order number or vendor order number
- Cost to project
- Disposition requested

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University Requirements
(cont.)

Some agencies also require the following additional information:

Condition of equipment
Location/custodian

- If appropriate, SPS faxes or e-mails the draft report to the departmental representative for review and verification of information.
- Upon return of the draft, SPS makes any necessary corrections; then mails, e-mails, or faxes the completed report to the appropriate government representatives, as indicated in the award documentation or governing agency guidelines (see also [Final Property Reports](#)).

Contracts require that annual reports continue to be submitted until the University receives final disposition instructions (see [Annual Property Reports](#)).

- Upon receipt of disposition instructions from the government representative, SPS ensures that the departmental administrator complete an Inventory Control Report to update the WSU's property inventory records accordingly (see *BPPM 20.50*).

For property acquired under a grant or cooperative agreement, if title is granted to WSU, or if the property is abandoned in place, no further reports are required.

For property acquired under a contract, a terminating report must be submitted to indicate final disposition if the previous report indicated that the University held contracted property. See [Final Property Reports](#) for information concerning contract reports.

LOANS, TRANSFERS AND DISPOSALS

Loans

WSU-Owned

Departments holding equipment that is no longer used are encouraged to explore opportunities to loan or exchange with other departments prior to arranging for disposal or sale. Inform Property Inventory of the loan by completing an Inventory Control Report according to instructions in *BPPM 20.50*. Indicate only a change in location if the ownership remains with the loaning department.

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Federally-Owned

Federal regulations encourage loan or transfer of government-owned equipment to other federally-supported projects when no longer needed on the original project. Request authorization from SPS prior to transfer.

When the transfer occurs, initiate an Inventory Control Report in accordance with *BPPM* 20.50. Check the **Federally Owned** box on the Inventory Control Report. Property Inventory works with SPS to ensure that federal officials are notified of the change.

See *BPPM* 20.78 for transfer of federal excess equipment.

Title Transfer

Transfer to WSU from the Federal Government

On many contracts title is transferred from the federal agency to WSU partway through or at the end of a project period. Transfer procedures are handled by SPS.

Transfer to Another Institution

See *BPPM* 40.16 and 20.50.

Sale or Transfer to Other WSU Departments

Follow procedures for surplus equipment in *BPPM* 20.76 and 20.80.

Disposal of Federally-Funded WSU-Owned Equipment

The item may be subject to a specified accountability period, which must expire before the University may sell the item. Contact SPS for information.

Cost of \$5,000 or More

When any accountability period has expired that applies to an item with a cost of \$5,000 or more, WSU may do one of the following:

- Keep the item and pay the federal agency its share of the market value.
- Request instructions from the agency.

Instructions from the agency may be to sell it and pay the agency its share of the proceeds, *or* ship it elsewhere.

Disposal of Federal Excess Property

See *BPPM* 20.78.

MAINTENANCE AND USE

Departments are responsible for the care, maintenance and use of all equipment in their custody. For equipment acquired under grants and contracts, the principal investigator shares this responsibility with the department.

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Accountability	Department management is responsible for properly documenting equipment receipt, storage, preservation, recordkeeping, physical control, inventory, and disposal.
Security	Principal investigators and departmental personnel are responsible for keeping equipment in a reasonably secure location.
Insurance	WSU-owned equipment is usually not insured unless obtained under an agreement that permits the sponsor to pay insurance premiums. Risk Management Services purchases all insurance for University equipment and property. See <i>Executive Policy</i> EP6.
Care and Maintenance	<p>Care and maintenance includes periodic inspection, regularly scheduled lubrication, protection from exposure, and proper cleaning prior to storage. The goal is to maintain the efficiency and usefulness of the equipment for as long as possible.</p> <p>Departments should keep records of maintenance, major repair, and deficiencies revealed during periodic inspection. (Principal investigators are responsible for ensuring that any special equipment care and maintenance requirements required by grants and contracts are implemented.)</p>
Utilization	<p>The equipment clause in most current contracts requires that federal equipment be used only for the contract for which it is acquired unless otherwise provided or approved by the cognizant federal agency contract administrator. The principal investigator is responsible for ensuring compliance with this requirement.</p> <p>The principal investigator is also responsible for notifying SPS when there is no further reason for retaining an equipment item acquired under a federal agreement.</p>
Subcontractor Control	
Subcontract Requirements	<p>Before a subcontractor under a federal contract may take temporary possession of federal equipment furnished by the University, the subcontract must include:</p> <ul style="list-style-type: none">• Provisions authorizing transfer, loan, or temporary reassignment of the equipment.• Federal flow-down provisions. Flow-down provisions are defined as requirements from the funding federal agency that apply to all entities operating under the award contract, e.g., contracting institutions, subcontractors.

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Subcontract Requirements (cont.)

- Special terms and conditions.
- Provisions requiring certification that the subcontractor has a property control system that is either federally-approved or meets federal property regulations, unless exempted by the special terms and conditions.
- Periods for which the subcontractor must submit property reports to WSU. When feasible, the subcontract is to include the subcontracting agency form numbers and applicable web site addresses for obtaining the forms.
- Other reporting requirements specified in the prime award.

Office of Research Support and Operations (ORSO)

Notify the Office of Research Support and Operations (ORSO) during subcontract development to ensure that the subcontract also includes provisions for the following:

- Conditions of use
- Control of equipment
- Period of use
- Return of equipment
- Location of use
- Shipping costs
- Insurance
- Loss, damage, or destruction
- Liability
- Maintenance

In addition, ORSO may request a copy of the subcontractor's federally-approved property control system or a copy of its property control policies.

Sponsored Programs Services

Sponsored Programs Services is responsible for ensuring that the subcontractor submits property reports for the reporting periods specified in the subcontract.

Sponsored Programs Services also takes action at award closure in cases where the subcontractor holds the title to the property (see [Property Closeout](#)).

Inventory Control Report

Upon approval of the subcontract, the responsible WSU department or principal investigator or equipment coordinator must complete an Inventory Control Report indicating a change of location (see *BPPM* 20.50).