

AURA Central Administrative Services Property Manual

1. Scope. The policies and procedures in the manual apply to all AURA centers and AURA staff that have custody of real or personal property that was acquired with funding from the NSF.

2. Definitions.

Acquisition cost means the cost of the asset including the cost to ready the asset for its intended use. Acquisition cost for equipment, for example, means the net invoice price of the equipment, including the cost of any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Acquisition costs for software includes those development costs capitalized in accordance with generally accepted accounting principles (GAAP). Ancillary charges, such as taxes, duty, protective in transit insurance, freight, and installation may be included in or excluded from the acquisition cost in accordance with the non-Federal entity's regular accounting practices See CFR 2 200-2.

AURA Center means any administrative unit of AURA, such as Gemini, LSST, NOAO and NSO.

AURA property treated as Federally-owned property means property in Chile that is titled in AURA's name, but which, under the terms of a cooperative agreement, is subject to the same cooperative agreement requirements as federally-owned property.

AURA property with no federal obligations is property that is titled in AURA's name that is not the subject of any cooperative agreement requirements. Property may be in this category because it was purchased without using federal funds. It may also be in this category because a cooperative agreement specifies that property purchased with federal funding with an acquisition cost below a certain threshold is titled in AURA's name and is not subject to any cooperative agreement requirements.

Business Manager or AURA Center Business Manager is the person responsible for the business and administrative aspects of an AURA Center. See section 3.2. for a listing of the Business Managers for each AURA Center.

CA-FATC-FFRDC means the NSF "Cooperative Agreement Financial & Administrative Terms and Conditions (CA-FATC)" document, as amended by the NSF "Cooperative Agreement Supplemental Financial & Administrative Terms and Conditions for Managers of Federally Funded Research and Development Centers (FFRDCs)" document.

CA-FATC-MLF means the NSF "Cooperative Agreement Financial & Administrative Terms and Conditions (CA-FATC)" document, as amended by the NSF "Cooperative Agreement Supplemental Financial & Administrative Terms and Conditions for Managers of Large Facilities" document.

Capital Assets means tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP. Capital assets include:

- a) Land, buildings (facilities), equipment, and intellectual property (including software) whether acquired by purchase, construction, manufacture, lease-purchase, exchange, or through capital leases; and
- b) Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance). See 2 CFR 200-12.

Capital Expenditures means expenditures to acquire capital assets or expenditures to make additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations, or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance). See 2 CFR 200-13.

CAS means AURA Central Administrative Services.

CAS Property Administrator means the CAS employees with the job title of "Property Administrator."

Donated Assets means the giving of an asset/monies, without payment, to AURA and/or AURA Centers to help further research in the field of astronomy.

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. See 2 CFR 200.33 and 200-313.

Note that 2 CFR 200.33 equipment can be either titled in AURA's name, or be federally-owned property.

Exempt Federally-Owned Property means property acquired under a Federal award the title based upon the explicit terms and conditions of the Federal award that indicate the Federal awarding agency has chosen to vest in the non-Federal entity without further obligations to the Federal Government or under conditions the Federal agency considers appropriate. This property is titled to AURA. See 2 CFR 200-312(c) and CA FATC 6E.

Federally Owned Property is property where title is held by the Federal Government of the United States of America. See 2 CFR 200-312.

Fair Market Value (FMV) means the value assigned to an Asset when received without a stated value. Research will be conducted to establish the current average value of a like item either on line or from different vendors. Consideration will be given to the condition of the Asset.

General Purpose Equipment means equipment which is not limited to research, medical, scientific or other technical activities. Examples include office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles. See 2 CFR 200-48. GAAP means Generally Accepted Accounting Procedures. See 2 CFR 200-49.

Lead Property Administrator means the CAS Property Administrator based in the CAS Tucson office.

Personal Property means property other than real property. It may be tangible, having physical existence, or intangible. See 2 CFR 200.78.

Property means real property or personal property. See 2 CFR 200.81.

Property Custodian means AURA employees who have the responsibility for the proper management and control of all AURA property within their work area, whether assigned to them or someone else. This responsibility includes reporting any known missing, stolen, or non-working property in their work area to their Department Supervisors or the AURA Property Officer, and updating PIMA.

Property Tracking System means the PIMA (Property Inventory Management Application) online property tracking system found at <https://cas.aura-astronomy.org/PIMA/en-US/Property>.

Real Property means land, including land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment. See 2 CFR 200-85 and 200-311.

Special Purpose Equipment means equipment which is used only for research, medical, scientific, or other technical activities. Examples of special equipment include microscopes, x-ray machines, surgical instruments, and spectrometers. See 2 CFR 200-89.

Supplies means all tangible personal property other than those described in §200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-Federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life. See 2 CFR 200-94 and 200-314.

3. Division of responsibilities. Unless expressly specified otherwise in a provision of this manual, the general division of responsibilities under this manual is as given below.

3.1. CAS is responsible for acquisition, receiving, tracking, reporting, and disposal functions. CAS Procurement is responsible for performing acquisition, receiving, tracking, reporting, and disposal functions described in this manual. CAS Accounting is responsible for all accounting tasks described in this Manual. The following staff positions are responsible for the following specific duties:

(a) Lead Property Administrator. The Lead Property Administrator is responsible for CAS Property Administrator duties for NOAO, NSO, LSST, WIYN and other duties as specified in this manual.

(b) Chile Property Administrator. The Chile Property Administrator is responsible for CAS Property Administrator duties for all AURA facilities located in Chile on Assets over \$5000.00

(c) Hawaii Logistics/Property Administrator. The Hawaii Logistics/Property Administrator is responsible for CAS Property Administrator duties for the Gemini North facilities on the Big Island of Hawaii and the NSO DKIST facility located on Maui, Hawaii.

(d) Gemini South Administrative Specialist – Operations & Facilities. The Administrative Specialist – Operations & Facilities at Gemini South is responsible for the CAS Property Administrator duties at Gemini South. Only responsible for tracking of items under \$5000 that Gemini adds to PIMA. Also see para 5.2 below.

3.2. Business Managers at each AURA Center are responsible for the appropriate use, security, and maintenance functions. The "Business Manager" at each AURA Center is responsible for that center's compliance with the provisions of the manual regarding appropriate use of property, securing and maintaining property, and reporting loss or damage. The "Business Manager" for each AURA Center, and the delegation of certain responsibilities to center staff, are given below:

(a) Gemini. The Business Manager for Gemini is the Gemini Chief Financial Officer.

(b) LSST. The Business Manager for LSST is the LSST Business Administrator.

(c) NOAO. The Business Manager for NOAO is the NOAO Deputy Director.

(d) NSO. The Business Manager for NSO is the NSO Business & Facilities Manager.

3.3. AURA Corporate V.P. of Administration is responsible for CAS and the AURA Center compliance. The AURA V.P. of Administration is responsible for ensuring that both CAS and the AURA Centers perform their responsibilities under this manual.

4. Updating Property Manual and continuing education.

(a) CAS Grants Officer notifies CAS Procurement Manager of changes. The CAS Grants officer shall review the terms of all new awards and amendments to existing awards and notify the CAS Procurement Manager of new or changed requirements related to property purchased with Federal funding.

(b) CAS Procurement Manager updates this manual. The CAS Procurement Manager shall promptly update this manual to incorporate new or modified Federal requirements as soon as possible after their release.

(c) CAS Procurement Manager is responsible for continuing education. The CAS Procurement Manager shall ensure that all new personnel who have responsibilities defined in this manual receive training on those responsibilities. When changes are made to this manual, the CAS Procurement Manager shall ensure that all personnel affected by those changes receive training on the new or modified provisions.

5. Classification of property under NSF cooperative agreements.

5.1. Property classifications used in this manual. This manual uses the following classifications of property. Note that a single item can have multiple classifications. See the Definitions section of this manual for the definitions of these classifications.

- (a) Federally-owned property- 2 CFR 200.33 and 200-312 equipment.
- (b) Exempt Property; Federal equipment titled in AURA's name- 2 CFR 200.312(c) and CA FATC 6E.
- (c) AURA property treated as Federally-owned property (located in Chile); and
- (d) AURA property with no federal obligations.

5.2. Determining property classifications.

5.2.1. Property classifications that apply regardless of location.

(a) Not directly charged to a federal award = AURA property with no federal obligations. Property that was not directly charged to any federal award is titled in AURA's name and is not subject to any federal award requirements.

(b) Less than \$5,000 = AURA property with no federal obligations. Items with an acquisition cost of less than USD 5,000 are AURA property with no federal obligations. See definition of equipment at 2 CFR 200.33 and 200.313(c) and cooperative agreement provisions setting acquisition threshold for title to be held by AURA.

(c) \$5000 or more = 2 CFR 200 equipment. Tangible nonexpendable personal property charged directly to a Federal award having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit, is 2 CFR 200 equipment. See the definition of "equipment" in 2 CFR 200.33. Note that the definition of "equipment" in 2 CFR 200 does not mention who holds title to an item, so an item that fits this definition is 2 CFR 200 equipment regardless of whether AURA or the US government holds title. Also, items located in Chile that fit this definition are 2 CFR 200 equipment.

(d) Donated Assets = The following steps will be followed when Assets are donated to any AURA Center:

(1) Property Administrators will acknowledge receipt of the Donated Asset. If formal paperwork is not received from the donor, Property Administrators will initiate formal paperwork and acknowledge receipt of the donated property.

(2) If there is no value assigned to the asset, research will be conducted to establish an FMV which will be utilized in establishing the record. (2 CFR 200.306 (i) (2) Cost Sharing or Matching).

(3) If the value is over \$5000.00, Property Administrators will establish a record in PIMA with the stated value or the FMV of the Asset. If the value is under \$5000.00, it will be tagged as pilferable if it meets the applicable guidelines.

(4) Property Administrators will complete and forward a request for a Journal Entry to add the value of the asset to the applicable capital (800) account if over the \$5000.00 threshold.

5.2.2. Property classifications that apply to property in the United States.

(a) Gemini: \$5,000 or more = Federally-owned property. The Gemini cooperative agreement provides that title vests in the US Government for items in the USA with an acquisition cost greater than \$5000. See Gemini CA AS-FATC.3.G.1.

(b) LSST: All property is titled in AURA's name. The LSST cooperative agreement states that title to all equipment vests in AURA. See CA-FATC-MLF 6.a.

(c) LSST: \$5,000 or more = 2 CFR 200 equipment titled in AURA's name. Because the LSST cooperative agreement provides that all equipment will be titled in AURA's name regardless of value there is no federally-owned property at LSST.

(d) NOAO & NSO: Between \$5,000 and \$25,000 = 2 CFR 200 equipment titled in AURA's name is Exempt Property. See also NOAO CA AS-FATC.6. E. and NSO CA AS-FATC.6. D.

(e) NOAO & NSO: More than \$25,000 = Federally-owned property. NOAO and NSO cooperative agreements provide that items in the USA with an acquisition cost greater than \$25,000 title vests in the US government. See CA-FATC-FFRDC 6.c. See also NOAO CA AS-FATC.6.C and NSO CA AS-FATC.6.B.

5.2.3. Property classifications that apply to property in Chile.

(a) Gemini: \$5000 or more = AURA property treated as federally-owned property. The Gemini cooperative agreement provides that title vests in AURA for all items in Chile, but that all rules and requirements in the cooperative agreement regarding federally-owned property shall apply to property in Chile with an acquisition cost greater than \$5000. See Gemini CA AS-FATC.3.H.4.

(b) NOAO: Between \$5,000 and \$25,000 = 2 CFR 200 equipment titled in AURA's name.

(c) NOAO: More than \$25,000 = AURA property treated as federally-owned property. The NOAO cooperative agreement provides that title vests in AURA for all items in Chile, but that all rules and requirements in the cooperative agreement regarding federally-owned property shall apply to property in Chile with an acquisition cost greater than \$25000. See NOAO CA AS-FATC 7.C, as amended by Amendment No. 7.

5.2.4. Summary chart of property classifications.

	USA Gemini	USA LSST	USA NOAO, NSO	Chile Gemini	Chile LSST	Chile NOAO
Under \$5,000	AURA property with no federal obligations	AURA property with no federal obligations	AURA property with no federal obligations	AURA property with no federal obligations	AURA property with no federal obligations	AURA property with no federal obligations
\$5,000 - \$25,000	Federally-owned property & 2 CFR 200 equipment	2 CFR 200 equipment	2 CFR 200 equipment	AURA property treated as federally owned property & 2 CFR 200 equipment	2 CFR 200 equipment	2 CFR 200 equipment
Greater than \$25,000	Federally-owned property & 2 CFR 200 equipment	2 CFR 200 equipment	Federally-owned property	AURA property treated as federally owned property & 2 CFR 200 equipment	AURA property treated as federally owned property & 2 CFR 200 equipment	AURA property treated as federally owned property & 2 CFR 200 equipment

5.3. Classification of items during procurement process.

5.3.1. Buyers shall charge all purchases of 2 CFR 200 equipment to object code 800.

Buyers shall charge all purchases of 2 CFR 200 equipment to object code 800 or 805. The use of this object code communicates to CAS Logistics and the CAS Property Administrators that the item must be tagged and tracked as 2 CFR 200 equipment under the CAS Property Manual. 2 CFR 200 equipment is defined in section 5.1 to 5.2.4 above.

5.3.2. Contract officers shall either charge 2 CFR 200 equipment to object code 800 or directly notify Accounting or the appropriate CAS Property Administrator. Contract Officers shall either charge contracts for 2 CFR 200 equipment to object code 800 or directly notify CAS Accounting and the appropriate CAS Property Administrator that an item purchased under a contract qualifies as 2 CFR 200 equipment.

6. Property tracking system. As required by 2 CFR 200.313(d) the CAS Procurement Manager shall maintain a database of all 2 CFR 200 equipment (which includes federally owned equipment), which shall include the following fields:

(a) A description of the equipment.

(b) Manufacturer's serial number, model number, Federal stock number, national stock number, or other identification number.

(c) Source of the funding for the equipment, including the award number.

(d) Whether title vests in the recipient or the Federal Government.

(e) Acquisition date (or date received, if the equipment was furnished by the Federal Government) and cost.

(f) Information from which one can calculate the percentage of Federal participation in the cost of the equipment (not applicable to equipment furnished by the Federal Government).

(g) Location and condition of the equipment and the date the information was reported.

(h) Unit acquisition cost.

(i) Ultimate disposition data, including date of disposal and sales price or the method used to determine current fair market value where a recipient compensates the Federal awarding agency for its share.

7. Procedures for receiving property, affixing property tags, and entering items in the property tracking system.

7.1. General policy regarding attaching property tags. (a) All 2 CFR 200 equipment must be tagged. All 2 CFR 200 equipment must have a property tracking tag attached to it with a unique tracking number so that AURA can perform the periodic physical inventories of 2 CFR 200 equipment required by 2 CFR 200.313 (d)(2), and comply with other tracking responsibilities under 2 CFR 200.313(d)(3)..

(b) Property tag number is based on PO number. The unique tracking number for each item of 2 CFR 200 equipment, also known as the property asset number is derived from the purchase order number as follows:

Property tag number character position(s)	Description	Example
1-6	First five digits of PO number, omitting the leading "N."	If PO number is N391233 then first five digits of property tag number are 391233
7	Dash	391233-
8	PO line number of item.	If item was the third line item of PO: 391233-3
9	Dash	391233-3-
10	Capital letter to distinguish multiple items from the same PO line.	If three of one PO line item were purchased then the first one would be 391233-3-A, the second one would be 391233-3-B, and the third one would be 391233-3-C.

(c) Federally-owned equipment shall be labeled as US Government property. The asset tags applied to federally-owned equipment shall include wording indicating that the US Government is the owner of the item, per 2 CFR 200.313(d)(3) which states that all federally owned equipment "shall be identified to indicate Federal ownership."

(d) Federally-owned equipment with an exempt status as stated in 5.2.2 (d) shall be labeled as US Government-E property, to identify those assets as capital property, but titled to AURA.

(e) IT and Pilferable assets will be tagged. Although not a Federal requirement, computer items such as desktop computers, laptops, tablets, hard drive, monitors, etc. will receive property tags to reduce the risk of misappropriation.

7.2. Property Administrators are notified of purchase orders charged to object codes that should receive property tags. The CAS Procurement Manager shall ensure that the Property Administrators receive an automated daily report showing all purchase orders issued that day that are charged to object codes that indicate items that need to receive property tags. These object codes are as follows:

- Object code 800 and 805: 2 CFR 200 equipment
- Object code 105 or 106: IT equipment

7.3. Property Administrators print asset tags for items to be delivered to their locations.

(a) Print asset tags. Each CAS Property Administrator shall review the report of purchase orders with items that should receive asset tags and print asset tags for all items that are to be delivered to their location that are charged to the object codes listed in section 7.2, above. The Lead Property Administrator shall also print asset tags for all AURA locations that do not have a local CAS Property Administrator.

(b) Federally-owned property receives "Property of US Government" asset tags. When printing property asset tags Property Administrators shall determine whether or not an item qualifies as federally owned property (see section 5, above) and use the appropriate asset tag format ("US Government Property" for federally-owned property; "US Government Property-E" for AURA exempt property; Property of AURA Center (center spelled out) for all other property.

(c) Deliver asset tags to person who will apply them when item is received. The CAS Property Administrators shall deliver the printed asset tags to the person responsible for receiving purchased items for their location. The Lead Property Administrator shall deliver printed asset tags to locations that do not have a CAS Property Administrator. Property Administrators shall verify that all asset tags delivered to others are applied to the items when they are received.

7.4. CAS Logistics receives purchased items and applies property tags. CAS Logistics processes each shipment received by AURA and inspects each item from vendors for condition and completeness and applies the property asset tags provided by the CAS Property Administrators.

7.5. Property Administrators enter items in the property tracking system. Each CAS Property Administrator shall monitor the status of the 2 CFR 200 equipment for which they have printed asset tags, and shall enter each item into the property tracking system as soon as they are received.

8. Tracking of Construction-in-Progress (CIP) and Work-in-Progress (WIP).

8.1. Definitions of Construction-in-Progress (CIP) and Work-in-Progress (WIP).

Construction-in-Progress (CIP) is defined as real property that is in the process of being manufactured or fabricated but is not yet complete. Work-in-Progress (WIP) is defined as equipment that is in the process of being manufactured or fabricated or a project that is in the research and/or development stage but is not yet complete. CIP and WIP consist of the costs of direct materials, direct labor, direct purchased services, and indirect costs, including general and administrative and overhead costs. Costs coded as CIP or WIP should not be depreciated. Costs coded as CIP or WIP are not included or tracked in inventory until the project is completed and a property tag is created. At that point, the asset, at full cost, is added to inventory and tracked in accordance with this Manual. See CA-FATC-FFRDC 6.a, and CA-FATC-MLF 6.c.6(a)

8.2. CAS Accounting reports completed CIP and WIP to CAS Property Officer for inclusion in PIMA. When CAS Accounting moves the accrued costs of a CIP/WIP account to the Capital Asset Balance Sheet upon the completion of a CIP/WIP project it shall also notify the CAS Property Officer that the item should be entered into PIMA, the CAS property tracking system.

9. Financial records regarding property and reconciliation with property tracking system.

(a) Accounting tracks purchases of property during fiscal year. During the course of each fiscal year CAS Accounting shall track each item charged to object code 800 (Capital Equipment), 805 (Capital Equipment- Computer), and 825 (Equipment Attached to Building) in the financial records for each AURA Center.

(b) Each month CAS Property Administrators reconcile property tracking system with financial records. At the beginning of each month, each CAS Property Administrator shall review the CAS Account financial records of items charged to object code 800 for their AURA Center during the previous month and verify that all items have been properly entered in the property tracking system.

(c) CAS Property Administrators shall reconcile property tracking system with financial records at the close of each fiscal year. Promptly after the end of a fiscal year each CAS Property Administrator shall review the CAS Accounting financial records of items charged to object code 800 for their AURA Center during the fiscal year and verify that all items have been properly entered in the property tracking system. Each CAS Property Administrator shall notify CAS Accounting once their fiscal year reconciliation is complete.

(d) CAS Accounting transfers items to Capital Asset accounts. Once a CAS Property Administrator has completed reconciling an AURA Center's financial records for the fiscal year with the records in the property tracking system, CAS Accounting shall perform a journal entry transferring the total cost accumulated in object codes 800, 805, and 825 for that AURA Center to the Capital Assets account for that center.

10. Acceptable Use Policies.

10.1. 2 CFR 200 equipment may not be used to provide services to outside organizations for prices lower than are charged by private companies.

(a) General rule. As required by 2 CFR 200.313 (c)(3) and 200.314(b) AURA shall not use 2 CFR 200 equipment acquired with Federal funds to provide services to non-Federal outside organizations for a fee that is less than private companies charge for equivalent services, unless specifically authorized by Federal statute, for as long as the Federal Government retains an interest in the equipment.

(b) CAS Contract Officer responsibilities. As the persons who should be involved in all sales of services to outside organizations, the CAS Contract Officers are responsible for ensuring that no contracts to provide services to outside organizations using 2 CFR 200 equipment are placed without documentation that the fee being charged is equal to, or greater than, the lowest fee charged by private companies for the same service.

10.2. Use of 2 CFR 200 equipment. As required by 2 CFR 200.313 (c), 2 CFR 200 equipment shall be used in the project or program for which it was acquired as long as needed, whether or not the project or program continues to be supported by Federal funds and shall not be encumbered without approval of the Federal awarding agency. When no longer needed for the original project or program, 2 CFR 200.313 (c)(2) equipment shall be used in connection with its other federally-sponsored activities, in the following order of priority:

(a) Activities sponsored by the Federal awarding agency which funded the original project, then

(b) Activities sponsored by other Federal awarding agencies.

10.3. Use of 2 CFR 200 equipment for other programs and projects and treatment of program income. As required by 2 CFR 200.313 (c) (2), during the time that 2 CFR 200 equipment is used on the project or program for which it was acquired, it shall be made available for use on other projects or programs if such other use will not interfere with the work on the project or program for which the equipment was originally acquired. First preference for such other use shall be given to other projects or programs sponsored by the Federal awarding agency that financed the equipment; second preference shall be given to projects or programs sponsored by other Federal awarding agencies. If the equipment is owned by the Federal Government, use on other activities not sponsored by the Federal Government shall be permissible if authorized by the Federal awarding agency. User charges shall be treated as program income.

10.4. AURA Center responsibility for acceptable use policies. The Business Manager of each AURA Center is responsible for ensuring that the staff of that center is informed about these policies regarding acceptable use of 2 CFR 200 equipment and ensuring that staff follows these policies. Fulfilling this requirement may involve center-specific policies regarding the use of 2 CFR 200 equipment. Examples of such center-specific policies are:

- The NOAO Central Facilities Vehicle Usage Policies and Procedures

10.5. AURA policy on use of government vehicles. All staff must follow AURA Policies and Procedures Section B.XX "Use of Government Vehicles."

11. Physical inventory. As required by 2 CFR 200.313(d)(2) the CAS Property Administrators shall perform a physical inventory of 2 CFR 200 equipment and the results reconciled with the property tracking system records at least once every two years. Any differences between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the causes of the difference. The Property Administrators shall, in connection with the inventory, verify the existence, current utilization, and continued need for the equipment.

12. No liens or encumbrances on property in Chile acquired with NSF cooperative agreement funding. The Gemini, LSST, and NOAO cooperative agreements all require that AURA "shall undertake to insure that no lien or encumbrances will attach to the real or personal property [acquired with cooperative agreement funding]." The CAS Contract Officers shall be responsible for ensuring that no agreements are entered into in Chile that would cause a lien or encumbrance to attach to this property. See LSST cooperative agreement section AS-FATC.6.B., Gemini cooperative agreement section AS-FATC.3.H, and NOAO cooperative agreement AS-FATC.7.B.

13. Moving 2 CFR 200 equipment between locations.

13.1. The CAS Property Administrator for an AURA Center must be notified whenever 2 CFR 200 equipment is moved to another location. The Business Manager of each AURA Center is

responsible for having policies and procedures in place that ensure that center staff inform the CAS Property Administrator before they move 2 CFR 200 equipment to a location outside of the building where it is currently located. This notice is required so that the CAS Property Administrator can update the item's location data in the property tracking system, notify the NSF when required (see below) and ensure that any applicable export control procedures are followed.

13.2. CAS Logistics personnel shall notify a CAS Property Administrator whenever 2 CFR 200 equipment is shipped. CAS Logistics personnel shall notify the CAS Property Administrator for the origin AURA Center whenever an item of 2 CFR 200 equipment is shipped or otherwise transported by them from one location to another. The CAS Property Administrator shall then update the location information for that item in the property tracking system.

13.3. NSF must be notified when federally-owned property is no longer at its original AURA Center and is not being used for that Center. As required by CA-FATC-FFRDC 6.d.4 the CAS Property Administrator for an AURA Center shall inform the NSF Grants and Agreements Officer and the NSF Property Administrator when federally-owned property is located at a place other than its original AURA Center and is not being used in connection with the work under the cooperative agreement that the item's cost was charged to.

14. Securing and maintaining 2 CFR 200 equipment.

14.1. Maintenance and repair.

14.1.1. Each AURA Center must have a maintenance program for 2 CFR 200 equipment. As required by 2 CFR 200.313 (d)(4), each AURA Center shall implement adequate maintenance procedures to keep 2 CFR 200 equipment in good condition. See also CA-FATC-FFRDC 6.f.

14.1.2. NSF approval is required for major repairs to federally-owned property. Approval from the appropriate NSF Grants and Agreements Officer is required before making major repairs or renovations to damaged federally-owned property. See CA-FATC-FFRDC 6.i.4. Each AURA Center shall notify its CAS Property Administrator before beginning repairs to federally owned property. The CAS Property Administrator shall then request the required approval from the NSF Grants and Agreements Officer.

14.2. Loss and damage to property.

14.2.1. AURA Centers are responsible for maintaining adequate safeguards to prevent loss, damage, or theft of 2 CFR 200 equipment. As required by 2 CFR 200.313 (d)(3) each AURA Center shall maintain a control system to insure adequate safeguards to prevent loss, damage, or theft of 2 CFR 200 equipment.

14.2.2. Any loss, damage or theft of 2 CFR 200 equipment shall be investigated and fully documented.

(a) General rule. As required by 2 CFR 200.313 (d)(3), any loss, damage, or theft of equipment shall be investigated and fully documented, as outlined in more detail below.

(b) Employee who discovers loss or damage shall report it to a CAS Property Administrator. Any AURA employee who discovers any loss, damage, or theft of 2 CFR 200 property shall immediately report the event to the CAS Property Administrator for their AURA Center. The CAS Property Administrator shall then report the event to the Lead Property Administrator, who shall report it to the Business Manager for that center, and the AURA risk management coordinator.

(c) AURA risk management coordinator shall investigate and prepare report. The AURA risk management coordinator shall promptly conduct an investigation of the event, prepare a report, and deliver the report to the Lead Property Administrator, who shall distribute the report to Business Manager and CAS Property Administrator for the AURA Center. The CAS Property Administrator shall put the report in the item's record in the property tracking system, and update the information for that item in the property tracking system as needed.

14.2.3. Lead Property Administrator shall report loss, damage, or theft of federally-owned property to the NSF. As required by 2 CFR 200.313 (d)(3) the Lead Property Administrator shall report any loss, damage, or theft of federally-owned property to the NSF Grants and Agreements Officer for the AURA Center where the event occurred within 10 working days after the event. As required by CA-FATC-FFRDC 6.i.3, the report to the NSF shall include:

1. The lost, destroyed, and damaged NSF-owned property.
2. The time and origin of the loss, destruction, or damage.
3. All known interests in commingled property of which the NSF-owned Property is a part.
4. The insurance, if any, covering any part of or interest in such commingled property.

14.2.4. Any amounts received as compensation for loss or damage to federally-owned property shall be used to repair or replace property. As required by CA-FATC-FFRDC 6.i.5, in the event AURA is indemnified, reimbursed, or otherwise compensated for any loss or destruction or damage to federally-owned property, it shall use the proceeds to repair, renovate or replace the federally-owned property involved, or shall otherwise reimburse the Government, as directed by the NSF Grants and Agreements Officer.

14.2.5. When there is loss or damage to federally-owned property AURA shall not relieve third parties of liability. As required by CA-FATC-FFRDC 6.i.5, AURA shall not do anything to prejudice the Government's right to recover against third parties for any such loss, destruction or damage and, upon the request of the NSF Grants and Agreements Officer, shall, at the Government's expense, furnish to the Government all reasonable assistance and cooperation (including the prosecution of suit and the execution of instruments of assignment in favor of the Government) in obtaining recovery.

14.2.6. Permission from NSF is required before agreeing to limit liability for loss or damage to federally-owned property in a contract. As required by CA-FATC-FFRDC 6.i.6, CAS Contract Officers shall include, in all contracts with other organizations that involve the other party having care, custody, or control of federally-owned property, appropriate provisions requiring the

return of all federally-owned property in the same condition as when received except for reasonable wear and tear or for the utilization of the property in accordance with the provisions of the cooperative agreement. As also required by CA-FATC-FFRDC 6.i.6, CAS Contract Officers must obtain prior approval from the appropriate NSF Grants and Agreements Officer before including any provision in any contract that limits or relieves a contractor from liability for loss or destruction to federally-owned property. Note that the Gemini cooperative agreement section AS-FATC.3.G.3 provides blanket approval waivers of liability for certain contracts:

"All subawardees integrating Government Property into instruments being built for the Gemini Observatory shall not be liable for loss or destruction of or damage to the government property provided by the Gemini Observatory, unless such loss, destruction, or damage results from the willful misconduct or lack of good faith on the part of the Subawardee."

14.2.7. AURA must enforce contractor liability for loss of or damage to federally owned property. As required by CA-FATC-FFRDC 6.i.7, AURA shall enforce the liability of contractors for any loss or destruction of or damage to the federally-owned property for the benefit of the Government, unless the contract contains a provision waiving or limiting such liability that was approved in advance by the appropriate NSF Grants and Agreements Officer as described in section 14.2.6.

15. Reporting.

15.1. Annual inventory report of federally-owned property to NSF.

(a) General. For each active NSF cooperative agreement or other award, the CAS Property Administrator responsible for that award shall submit an annual inventory listing to the NSF Property Administrator of all federally-owned property (equipment, land and buildings) charged, or transferred, to that award. Each annual inventory report should be submitted electronically to fsrpts@nsf.gov and must be received by no later than August 15 of each year unless another date is specified in writing by the appropriate NSF official. See 2 CFR § 200.312, CA-FATC-FFRDC 6.a, and CA-FATC-MLF 6.c.6(a).

(b) Information that is included in the annual inventory report. Each annual property report shall include the type of equipment or property, serial number, acquisition price, acquisition date, condition of the equipment, and NSF award number. See CA-FATC-FFRDC 6.a, and CA-FATC-MLF 6.c.6(a).

(c) Work in Progress (WIP) and Construction in Progress (CIP) is included in annual inventory report. Each annual inventory report shall include a description of Construction-in-Progress (CIP) and Work-in-Progress (WIP) items and construction costs incurred to date. See CA-FATC-FFRDC 6.a, and CA-FATC-MLF 6.c.6(a). The CAS Property Officer shall obtain a report on all current CIP and WIP from CAS Accounting, for inclusion in the annual inventory report. CAS Accounting is responsible for tracking the costs of CIP and WIP per section 8 of this manual.

15.2. Annual report to Gemini Board on disposals of federally-owned property. Section AS-FATC.3.G.2 of the Gemini cooperative agreement provides that "as part of its annual financial report, [AURA] shall report to the [Gemini] Board on the disposal of Government property. The Gemini Business Manager shall prepare and present this report using data obtained from CAS Property Administrator responsible for Gemini.

15.3. Inventory report of federally owned property at end of award or upon request. Upon the expiration or termination of a NSF cooperative agreement or other award, and such other times as directed by the NSF Grants and Agreements Officer, the CAS Property Administrator responsible for that award shall submit inventory schedules to the NSF Grants and Agreements Officer and the NSF Property Administrator of all federally-owned property charged, or transferred, to that award. See 2 CFR 200.312 (a) and CA-FATC-FFRDC 6.g

15.4. Reporting of loss, damage and theft of federally-owned property. See section 14.2 of this manual.

15.5. Reporting when federally-owned property is not at its original AURA Center. See section 13.3 of this manual.

16. Insurance.

16.1. Real property and 2 CFR 200 equipment titled in AURA's name shall have the same insurance coverage as other AURA property. As required by 2 CFR 200.310, the AURA risk management coordinator shall insure 2 CFR 200 equipment and real property titled in AURA's name with the same coverage as AURA property that was not charged to a federal award.

16.2. Cost of property insurance for federally-owned property may not be charged to cooperative agreement unless authorized by the NSF. Unless specifically authorized by the NSF Grants and Agreements Officer, the cost of insurance covering loss or destruction of or damage to federally-owned property may not be charged to a NSF cooperative agreement. See CA-FATC-FFRDC 6.i.2. CAS Buyers, CAS Logistics staff and the AURA risk management coordinators, shall refer all requests to purchase shipping insurance, or other insurance against loss or damage of property, to a CAS Contract Officer to determine if NSF approval is required for the insurance purchase. The CAS Contract Officer will then request approval from the appropriate NSF Grants and Agreements Officer for the insurance purchase if required.

17. Excess property.

17.1. Requesting disposal in property tracking system. When someone determines that 2 CFR 200 equipment or federally-owned property is no longer needed to perform the cooperative agreement for which it was purchased, they shall request disposal of the item in the property tracking system. The CAS Property Administrator for that AURA Center will then review the request and determine whether or not the item truly is excess to the needs of the AURA Center, and if it is, then approve the disposal request in the property tracking system, which will move the item to the "pending disposal"

list in the property tracking system. The CAS Property Administrator will then complete the appropriate steps to dispose of the item described below.

17.2. Excess 2 CFR 200 equipment and/or federally-owned property at AURA Centers other than Gemini.

(a) Governing federal requirements. 2 CFR200.313(e)(2) governs excess 2 CFR 200 equipment that is not federally-owned, and it generally provides for reporting excess items to the funding agency, and then the funding agency either takes the item or determines if another agency needs the item, and then the funding agency directs the recipient to ship the item or sell it. 2 CFR 200.313(e) governs excess federally-owned property, and it generally provides for reporting excess items to the funding agency and then the agency either taking the item or reporting it to the GSA. CA-FATC-FFRDC 6.h. also governs excess federally owned property, and it generally provides that excess property is reported to the NSF and then disposed of as designated by the NSF. The following provisions harmonize the applicable federal requirements and the NSF's actual practices.

(b) Excess 2 CFR 200 equipment titled in AURA's name with no current market value may be scrapped. If the CAS Property Administrator determines that an item has no significant current market value (other than as scrap) then that determination shall be noted in the property tracking system and the item shall be disposed of by either selling it for scrap or arranging for an appropriate disposal method such as recycling service, and the remainder of the procedures regarding disposition of excess property shall not be followed.

(c) Excess 2 CFR 200 equipment and federally-owned property should be offered to other NSF FFRDCs. For items located in the United States, the CAS Property Administrator shall initially contact other NSF funded FFRDCs to see if they are interested in the excess 2 CFR 200 equipment or federally owned property that has significant current market value.

(d) CAS Property Administrator requests approval for disposition from NSF. If AURA has no need for 2 CFR 200 equipment with significant market value the CAS Property Administrator shall request approval from the NSF Property Administrator for a proposed disposition method.

1. If an item has no significant current market value except as scrap, the CAS Property Administrator shall request permission to scrap the item.

2. If a NSF funded FFRDC has requested the item, the CAS Property Administrator should request NSF approval to transfer the item to the FFRDC.

3. For items located in the United States, if no FFRDC has expressed interest in the item the CAS Property Administrator should request permission to post the item on the GSA excess property list.

4. For items located outside of the United States with significant market value the CAS Property Administrator should request approval to sell the item.

5. Dispose of item using method approved by NSF. Once the NSF Property Administrator has approved of the proposed disposal method the CAS Property Administrator shall dispose of the item using the approved method.

17.3. Excess 2 CFR 200 equipment and/or federally-owned property at Gemini.

(a) Governing federal requirements. In addition to the federal requirements discussed in section 17.2, above, the Gemini Cooperative Agreement contains the following provisions:

Gemini cooperative agreement section AS-FATC.3.G.2. Disposition

a. When any item of Government property having a value equal to or below \$50,000 or such other limit as may be established by the Gemini Board under Article 7.2 of the Gemini Agreement is either surplus to the future requirements of Gemini or unserviceable and beyond economic repair, the Awardee may (i) transfer or otherwise dispose of Government property accumulated under this Cooperative Agreement or (ii) the Awardee may itself acquire title to such property. However, if the property is surplus to the future requirements of Gemini, the Awardee will offer it for sale to Parties to the Gemini Agreement before taking title itself or selling or otherwise transferring the property to non Parties to the Gemini Agreement. All proceeds realized from any disposal of such property shall be reinvested in Gemini. The Awardee is required to notify the NSF Property Administrator of any disposition of Government Property under this clause.

b. If the value of Government property identified for disposal exceeds \$50,000, the Awardee shall transfer or dispose of it only with the written approval and subject to the written instructions of the NSF Property Administrator; this approval and instructions shall be given only after compliance with Article 7.3 of the Gemini Agreement.

Section 7.3 of the Gemini Agreement provides:

Where the value of an asset identified for disposal exceeds the limit referred to in Article 7.2 above, the Managing Organization shall seek the approval of the Board before disposing of that asset and shall seek instruction from the Board as to whether the proceeds realized are to be reinvested in Gemini or distributed between the Parties in proportion to their contributions to Gemini.

Although Gemini section AS-FATC.3.G.2.a states that federally-owned property at Gemini may be disposed of without prior approval from the NSF Property Administrator, AURA has decided to obtain approval from the NSF Property Administrator for such disposals. Note also that because the threshold in the Gemini cooperative agreement for federally owned property is currently \$5,000, the procedures below only address federally-owned property. In the event that the threshold for federally owned property is raised in the Gemini cooperative agreement then additional procedures will need to be added regarding the disposal of 2 CFR 200 equipment titled in AURA's name.

(b) Gemini Business Manager shall request Gemini Board approval to dispose of federally-owned property with a value greater than \$50,000. When federally-owned property at Gemini is determined to be excess the CAS Property Administrator for Gemini shall make and document a determination of the items current fair market value. If the item have a value of greater than USD 50,000 the CAS Property Administrator for Gemini shall notify the Gemini Business Manager, who will then request approval from the Gemini Board to dispose of the item, and instructions on how the proceeds should be distributed, as required by section 7.3 of the Gemini Agreement.

(c) CAS Property Administrator for Gemini offers to sell excess federally-owned property at Gemini to the parties to the Gemini Agreement. When federally-owned property at Gemini is determined to be excess, and any Gemini Board approvals obtained for items with a value over \$50,000, the CAS Property Administrator shall contact the National Gemini Office of each of the parties to the Gemini agreement to see if they, or any research institution funded or operated by that Party to the Gemini Agreement, are interested in purchasing it. If more than one party expresses interest the CAS Property Administrator shall obtain bids from each party and determine the offer that is the best value to Gemini and then proceed to the next step. If only one party expresses interest the CAS Property Administrator shall offer to sell the item for the current fair market value as determined by appropriate research, and then proceed to the next step if that party indicates its willingness to buy the item for that price. If no party expresses interest in purchasing the item within a reasonable amount of time, then the CAS Property Administrator shall proceed to the next step.

(d) CAS Property Administrator for Gemini then requests approval for disposition from NSF. Once excess federally-owned property at Gemini has been offered to the Parties to the Gemini Agreement, the CAS Property Administrator shall request approval from the NSF Property Administrator for a proposed disposition method.

1. If an item has no significant current market value except as scrap, the CAS Property Administrator shall request permission to scrap the item.

2. If a Party to the Gemini Agreement has offered to purchase the item for a price the represents the best value to Gemini after bidding, or the current fair market value, the CAS Property Administrator shall request NSF approval to sell the item to that Party to the Gemini Agreement.

3. If no Party to the Gemini Agreement has offered to purchase the item for a price that meets the criteria in the preceding paragraph, then the CAS Property Administrator shall request NSF approval to sell the item to the public pursuant to section 17.5, below.

(e) Dispose of item using method approved by NSF. Once the NSF Property Administrator has approved of the proposed disposal method the CAS Property Administrator for Gemini shall dispose of the item using the approved method.

17.4. Trade-ins or sales to finance replacement of 2 CFR 200 equipment titled in AURA's name and /or federally-owned property. When an AURA Center staff person wishes to replace an item of 2 CFR 200 equipment titled in AURA's name by either trading it in, or selling it and applying the proceeds towards the purchase of replacement equipment, they shall initiate the process with the CAS Property Administrator for their center. When federally-owned Asset is utilized as a trade-in for

a like Asset, Procurement will notify the CAS Property Administrator of the request so that Federally required license plates, if required, can be obtained from NSF. Once the Assets are received the CAS Property Administrator will notify the NSF Property Administrator as is required by CA-FATC-FFRDC 6.h.2. See section 17.5 regarding sales of 2 CFR 200 equipment and/or federally owned property. The NSF has indicated in the past that the special procedures for Gemini regarding offering items to the Parties to the Gemini Agreement do not need to be followed for trade-ins or sales to finance the purchase of replacement equipment.

17.5. Procedures for sales of 2 CFR 200 equipment and/or federally-owned property. When it is appropriate to dispose of an item of AURA owned 2 CFR 200 equipment, and when NSF has approved sale of federally-owned Assets by sale under any of the procedures described in section 17.4, the CAS Property Administrator shall sell the item using a method that provides competition to the extent practicable and which will result in the highest possible return, and shall document the sales method and competition obtained in the property tracking system. If competition is not practical, the CAS Property Administrator shall document the reason that it is not practical to sell the item competitively and shall also document that the price obtained is reasonable. See 2 CFR 200.313(d)(5).

17.6. Procedure for transfers of federally-owned vehicles. When a federally-owned vehicle is to be transferred to a non-federal party after following the procedures described above the CAS Property Administrator shall ask the NSF Property Administrator to create an SF-97 form for the transaction, shall have the transferee sign the SF-97 form, and shall return the completed SF-97 form to the NSF Property Administrator. This section only applies when vehicles are leaving the Federal Fleet via GSA authorized transfer or sale.

Change Log for CAS Property Manual

29 July 2016

Added language describing donations

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