Status **Pending** PolicyStat ID **20613037**

Last Approved	N/A
Effective	Upon Approval
Next Review	3 years after approval
Owner	Tara Thomason
Document Area	Vice President and Chief Financial Officer
Applicability	Saint Louis University Campus Wide

Federal Expenditures And SEFA Policy

Federal Expenditures and SEFA Policy

Responsible University Official: Vice President and CFO/David Heimburger

Policy Owner: Assistant Vice President & Controller / Tara Thomason

Policy Contact: Accounting Director / Krista Weik

1.0 Reason for Policy

Saint Louis University receives federal financial assistance in the form of grants, contracts, and other awards that are subject to federal reporting and audit requirements. Accurate and consistent reporting of federal expenditures is essential to ensure compliance with Office of Management and Budget (OMB)

Uniform Guidance, maintain eligibility for future federal funding, and support the integrity of the University's financial statements and external audits.

This policy establishes a framework for identifying, recording, and reporting federal expenditures in accordance with federal regulations and generally accepted accounting principles.

2.0 Policy Statement

Saint Louis University reports federal expenditures in accordance with OMB Uniform Guidance, Title 2 of the Code of Federal Regulations (2 CFR) Part 200, including the preparation of the Schedule of Expenditures of Federal Awards (SEFA) for inclusion in the University's annual Uniform Guidance audit.

Federal expenditures are recognized and reported based on allowable costs incurred under approved federal awards, consistent with the terms and conditions of the award, federal cost principles, and applicable accounting standards. The University is committed to maintaining complete, accurate, and supportable records to substantiate amounts reported as federal expenditures. Federal award activity is accounted for using a distinct fund designation within the University's accounting system to ensure federal expenditures are separately identifiable and can be accurately reported, monitored, and audited in accordance with OMB Uniform Guidance requirements.

The SEFA serves as the primary schedule used to determine audit requirements and major program selection under the Uniform Guidance. Accordingly, all federal expenditures must be accurately classified, recorded, and reported in a manner that ensures compliance with federal regulations and audit standards.

3.0 Scope

This policy applies to all operating units of Saint Louis University, excluding Saint Louis University-Madrid, including all faculty, staff, students, volunteers, and other workforce members not otherwise identified.

This policy applies to all federal awards administered by Saint Louis University, including grants, cooperative agreements, Title IV funding, contracts, and other forms of federal financial assistance, whether received directly from federal agencies or passed through non-federal entities.

4.0 Procedures

Federal expenditures represent the use of federal award funds for allowable costs incurred during the performance period of a federal award. Expenditures are reported in the period in which the costs are incurred, regardless of when cash is received from the federal agency or pass-through entity.

Allowable costs are determined in accordance with:

- The specific terms and conditions of the federal award
- 2 CFR Part 200, Subpart E – Cost Principles
- University accounting policies and procedures

The University prepares the SEFA annually to report total federal expenditures incurred during the fiscal year. The SEFA includes, at a minimum:

- The name of the federal awarding agency
- The Assistance Listing (ALN/CFDA) number
- The federal award identification number
- The fiscal year expenditures incurred
- Identification of pass-through awards and pass-through entities

The SEFA is used by external auditors as the basis for determining the scope of the Uniform Guidance audit and identifying major federal programs. See SEFA SOP.

5.0 Sanctions

Individuals who fail to comply with this policy and the procedures associated with it may be subject to disciplinary actions guided by the University's *Staff Performance Management Policy*, *SLU Faculty Manual (St. Louis Campus)*, or *Student Handbook*. Non-compliance with this policy may result in disciplinary action, up to and including separation from the University.

Failure to properly record or report federal expenditures may result in audit findings, questioned costs, repayment of funds, penalties, or loss of current or future federal funding.

6.0 Responsibilities

University departments are responsible for:

If federal funding outside the typical scope of Title IV or Sponsor Program funding is applied for, reporting this application to the Office of the Controller for awareness and alignment for accounting;

Ensuring costs charged to federal awards are allowable, allocable, reasonable, and properly documented;

Complying with award terms and federal regulations.

The Office of the Controller is responsible for:

Interpreting federal reporting requirements;

Preparing and reviewing the SEFA;

Ensuring federal expenditures are accurately reported in the Uniform Guidance audit;

Coordinating with external auditors regarding federal awards.

7.0 References

University Policies Including But Not Limited To:

Non-Retaliation Policy

Reporting Concerns of Misconduct Policy

Staff Performance Management Policy

University Sponsored Projects and Grants Policies

University Resources Including But Not Limited To:

SLU Faculty Manual (St. Louis Campus)

External Resources Including But Not Limited To:

OMB Uniform Guidance, 2 CFR Part 200

Uniform Guidance Audit Requirements (Subpart F)

Schedule of Expenditures of Federal Awards (SEFA) Instructions

8.0 Definitions

Federal Award – Financial assistance provided by a federal agency, either directly or through a pass-through entity, including grants, cooperative agreements, and certain contracts.

Federal Expenditures – Allowable costs incurred under a federal award during the reporting period.

Pass-Through Entity – A non-federal entity that provides federal funds to a subrecipient to carry out a federal program.

Schedule of Expenditures of Federal Awards (SEFA) – A schedule that summarizes federal award expenditures for the fiscal year and is used in the Uniform Guidance audit.

Uniform Guidance – OMB regulations codified at 2 CFR Part 200 that establish administrative, cost, and audit requirements for federal awards.

9.0 History

This policy redacts/rescinds any previous policies that may have been in place related to this topic.

Approval Signatures

Step Description	Approver	Date
Chief Policy Officer review before PRC	Michael Reeves	Pending

Applicability

SLUCare, Saint Louis University