



OCEAN  
OBSERVATORIES  
INITIATIVE

# PROPERTY MANAGEMENT PLAN

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In Cooperation with:

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## 1 Introduction and Purpose

The Ocean Observatories Initiative (OOI) Property Management Plan (PMP) establishes an effective property control system for use by the Woods Hole Oceanographic Institution (WHOI) and the Implementing Organizations (IO) in the management and administration of OOI property and equipment purchased or acquired with funding received from the National Science Foundation (NSF) to support the OOI project. The OOI Property Management System consists of the policies and procedures of WHOI and each of the IOs, and the activities and reports generated by all of these entities as a result of the implementation of those policies and procedures.

This PMP will be implemented by WHOI Program Management Office (PMO) staff under the direction of the WHOI **Property Officer**, supported by WHOI's Senior Contracts Officer, Grant & Contract Services, and establishes requirements for the IOs acquisition, tagging, documenting, inventorying both acquired and in-possession OOI equipment, and reporting OOI property and equipment information to WHOI. This is the official guidance for WHOI and the IOs to provide property and equipment support for the OOI project.

This PMP is consistent with the property standards of the U.S. Office of Management and Budget's Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, 2 Code of Federal Regulations (CFR) 200 (Uniform Guidance), the NSF Proposal and Award Policies and Procedures Guide (PAPPG), NSF Cooperative Agreement Financial & Administrative Terms and Conditions (CAFATC), the NSF Cooperative Agreement Modifications and Supplemental Financial & Administrative Terms and Conditions for Major Multi-User Research Facility Projects and Federally Funded Research and Development Centers (Supplemental CAFATC), as well as the applicable terms and conditions of NSF Award OCE-1743430 (OOI 2.0 Award) and those established in each IO's OOI subaward.

## 2 Scope

As the official guidance for WHOI and the IOs to provide property and equipment management support for the OOI Project, this PMP documents the unique policies, procedures and practices as they pertain to OOI property management and administration and defines the relationships between WHOI and the IOs in the management and administration of OOI property.

- Each IO has and is expected to maintain formal written policies, plans and procedures that provide an effective property control system consistent with the requirements of 2 CFR 200.310-316, CAFATC Article 6, and Supplemental CAFATC, and the terms and conditions of each IO's subaward. Each IO shall identify to WHOI PMO an IO Property Manager(s) (IOPMs) who will have authority to interact with the WHOI Property Officer on OOI property-related matters. Further, the IOs are expected to maintain and update their institutional property policies and procedures on the web links identified below:
- WHOI – <http://property.whoi.edu/property/> - The WHOI link is accessible from inside WHOI network only. PDF property management reports are available upon request
- OSU - <http://oregonstate.edu/fa/manuals/book/export/html/135>
- UW - <http://www.washington.edu/admin/rules/policies/APS/61.01.html>. The UW website is maintained and controlled by the UW Rules and Coordination Office.

IOPMs shall promptly inform the WHOI Property Officer, with copies to WHOI PMO and WHOI's Senior Contracts Officer, Grant & Contract Services, of all changes to their OOI IOPMs, property management policies, plans and procedures.

## 3 Key Roles and Responsibilities

The relationship of WHOI and the IOs is depicted in the organization chart shown at the top of the

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following page. The key roles and responsibilities of WHOI and the IOs for OOI property management are:

### **3.1 Woods Hole Oceanographic Institution**

- i. The WHOI Property Officer serves as the WHOI senior level official with responsibilities for:
  - Tracking and monitoring inventory of OOI property and equipment.
  - Compiling required property-related reports, ensuring they are accurate and complete, and submitting them to the NSF as required under the applicable terms and conditions of the OOI 2.0 Award, including through the NSF's Central Property Information Repository (CPIR).
  - Conducting periodic on-site property reviews examining OOI facilities and equipment.
  - Ensuring subawardee and subcontractor (if in possession of OOI property) monitoring of inventory, use and disposition of equipment, and reporting any deviations and changes to WHOI PMO and WHOI Senior Contracts Officer, Grant & Contract Services.
  - Monitoring subawardee or subcontractors' activities related to OOI property for compliance with Federal regulations, NSF terms and conditions, award and subaward or subcontract terms and conditions, and this Property Management Plan.
  - Ensuring WHOI and IO compliance with all OOI award terms and conditions related to government-owned property and equipment (if any), and property and equipment purchased or acquired with funding received from NSF to support the OOI project.
  - Ensuring that reports to the Federal government through NSF's CPIR related to OOI equipment and property are accurate, complete and timely submitted.
  - Managing and administering the WHOI and OOI property management policies, procedures, and property management system.
  - Updating policies, procedures and internal controls affecting the administration of OOI Property and the Property Management System at WHOI.
  - Ensuring WHOI is compliant with Federal regulations related to OOI property.
  - Implementing policies and procedures for ensuring compliance with Federal regulations and award terms related to OOI property and equipment.
  
- ii. The Senior Contracts Officer, Grant & Contract Services supports the WHOI Property Officer and has responsibility for:
  - Ensuring subawards and subcontracts contain appropriate flow-down clauses, project-specific requirements and guidance related to OOI property.
  - Supporting the Property Officer in preparing accurate, complete and timely government-required property reports .
  - Review and approval of required subawardee or subcontractor OOI Project property reports, and incorporation into submissions to NSF.
  - Support WHOI Property Administration Office within Finance & Accounting with periodic review of policies, procedures and internal controls affecting the administration of the Property Management System at WHOI.

### **3.2 Implementing Organizations**

- i. The designated **IOPM** serves as the main point of contact to WHOI for property management matters. The specific duties will depend on institutional requirements, but will generally include duties similar to those of the WHOI Property Officer and Senior Contracts Officer, Grant & Contract Services. These duties may include, but are not limited to:

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- Ensuring compliance with award terms and conditions related to WHOI and OOI property.
  - Compiling required property reports and ensuring that they are accurate and complete.
  - Coordinating the preparation and submission of all required documentation and inventory reports (e.g., annual inventory and biennial physical inventory per 7.6 and 8 below) to WHOI's PMO and the Property Officer on all actions affecting property including, but not limited to acquisitions, permanent transfers, losses, damage, and disposals.
  - Investigating, searching for, and reporting to WHOI Property Officer all instances in which a loss or theft of OOI property is detected or suspected.
  - Overseeing the proper record-keeping, use, maintenance and protection of OOI property.
  - Overseeing and assisting in accomplishing inventory requirements as established by government standards and subaward terms and conditions.
  - Ensuring that sub-tier awardees and contractors who have custody of Federally-funded property, or purchase or acquire property or equipment with funding provided by NSF to support the OOI project, establish and maintain adequate property and equipment management systems and comply with all property and equipment reporting requirements.
- ii. The IO OOI **Project Property Manager** reports to the IOPM and provides day-to-day oversight of OOI property. The specific duties will depend on institutional requirements, but will generally include duties similar to those of the WHOI Property Officer. These duties may include, but are not limited to:
- Preparation and submission of all required documentation to the Institution Level Property Manager (if applicable) for all actions affecting that property including, but not limited to acquisitions, transfers, losses, damage, and disposals to support entries in the property management system.
  - Reporting to the IOPM, and Institution Level Property Manager (if applicable), all instances in which a loss or theft of property is detected or suspected.
  - Ensuring the proper use, maintenance and protection of OOI property.
  - Accomplishing inventory requirements as determined by the IOPM.
  - Establish sub-custodian (sub-tier awardee or contractor) property controls, including custody receipts.

Also see Appendix 1 for an OOI Property and Equipment Procedure Checklist. Should the IO be the acquiring entity or **the custodian** of OOI property, the IO will be responsible for property management, storage, security, inventorying, and other requirements as stated within this document.

#### 4 Definitions

Closeout	The process by which a Federal awarding agency determines that all applicable administrative actions and all required work of the award have been completed by an IO and WHOI. (2 CFR 200.16 )
Computing Device	Machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or peripherals) for printing, transmitting and receiving, or storing electronic, information. (2 CFR 200.20).
Contract	A procurement contract under an award or subaward, and a procurement subcontract under a recipient's or subrecipient's contract. (2 CFR 200.22)

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Equipment	Tangible nonexpendable personal property including exempt property charged directly to an award having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. (2 CFR 200.33)
Excess Property	Property under the control of an IO that is determined to be no longer required for OOI needs or the discharge of the IO's responsibilities in support of the OOI program. (2 CFR 200.311(c) and PAPPG Part II, IX. D.5)
Federally-Funded Property	Property acquired that is directly chargeable to a Federal award.
Found Equipment	Equipment found during a physical inventory or other inspection for which there appears not to have been any previous record.
General Purpose Equipment	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. (2 CFR 200.48)
Government Furnished Property	Property in the possession of, or directly acquired by, the Government and subsequently furnished to the awardee for performance of an award. Government-furnished property includes, but is not limited to, spares and property furnished for repair, maintenance, overhaul, or modification. Government furnished property includes awardee-acquired property if the awardee-acquired property is a deliverable under the award when accepted by the Government for continued use under the award. (Federal Acquisition Regulation (FAR) 52.245-1(a))
Government Grant/Agreement/ Contracting Officer	The duly authorized individual delegated by an appropriate Government authority to make an award of a grant, cooperative agreement or contract, and thereafter administer the award, on behalf of the Government.
Government Property	All property owned or leased by the Government, or acquired by the Government under the terms of an award. Government property includes both Government-furnished and awardee-acquired property. Government property includes material, equipment, special and general purpose equipment, and real property. Government property does not include intellectual property and software. (FAR 52.245-1(a))
Intangible Property	Property having no physical existence, such as trademarks, copyrights, patents and patent applications and property, such as loans, notes and other debt instruments, lease agreements, stock and other instrument of property ownership (whether the property is tangible or intangible). (2 CFR 200.59)
Personal Property	Property other than real property. It may be tangible, having physical existence, or intangible, having no physical existence, such as copyrights, patents, or securities. (2 CFR 200.78)
Property	Real property or personal property. (2 CFR 200.81)



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Real Property	Land, including land improvements, structures and appurtenances thereto, but excludes movable machinery and equipment. (2 CFR 200.85)
Sensitive Property	Items such as laptop computers, cameras, cell phones and other equipment, regardless of acquisition value, that is easily stolen or otherwise misappropriated. Also, property that is potentially dangerous to the public safety or security if stolen, lost, or misplaced, or that shall be subject to exceptional physical security, protection, control, and accountability. Examples include hazardous materials or wastes, or precious metals. (FAR 52.245-1(a))
Subaward	An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out a part of a Federal award received by the pass-through entity. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract. (2 CFR 200.92)
Subrecipient	A non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency. (2 CFR 200.93)
Supplies	All tangible personal property excluding equipment. A computing device is a supply if the acquisition cost is less than \$5,000, regardless of the length of its useful life. (2 CFR 200.94)

**5. Transfer of Equipment and Property**

As of October 1, 2018, NSF transferred all OOI property and equipment then in the custody of OOI's participant organizations and title thereto to WHOI under the cooperative agreement identified as OCE-1743430. Under this award, WHOI and the IOs shall continue to use and disposition OOI property and equipment for the NSF-authorized purposes of the project subject to all requirements as established under regulations and terms and conditions identified herein at Section 1, Introduction and Purpose and Section 2, Scope, above (Uniform Guidance, Sections 200.310-.316; CAFATC; Supplemental CAFATC; PAPPG and the terms and conditions of the OOI 2.0 Award and subawards thereunder). These regulations, terms and conditions also establish requirements, conditions, and title holder (the acquiring entity) for equipment, property, and supplies acquired subsequent to the OOI 2.0 Award. WHOI and the IOs shall not authorize use of OOI property for non-OOI purposes without the prior written approval of the NSF Grants and Agreements Officer.

**i. New Property and Equipment**

The OOI Operations and Maintenance Plan (DCN 1010-00000) anticipates ongoing purchases of depot level spare parts and operations support equipment, as well as purchases of replacement sensors and equipment. Also, as new technologies are developed, new instruments and nodes may be purchased to be integrated into the expandable OOI Network. IOs will inform WHOI PMO of the need for new property and equipment as part of their Annual Work Plan submissions to the PMO, or as such needs are identified.

As new purchases are made by each IO, the IO will add new OOI property and equipment to its inventory and will track and report on new items in accordance with the terms of each IO's

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subawards and the IO's written property management policies, plans and procedures. Title to and risk of loss or damage for new equipment, supplies and system components shall be in accordance with those regulations, terms and conditions identified and referenced in this Section 5 and incorporated in each IO's subaward.

### **ii. System Decommissioning**

Over the life cycle of the OOI program, one or more legacy systems or subsystems will be decommissioned (or moved as in the case of the Pioneer array). In some cases, the legacy system must be removed before a new system can be deployed and commissioned. In these cases, the decommissioning event will occur prior to the new system commissioning. In most cases, however, the legacy and new technology may reside side-by-side for a period of time before the legacy system is decommissioned and after the new system is commissioned. A decommissioning plan for each system will delineate the transition between the legacy and new technology, including processes for management, oversight and approval, including final disposition of decommissioned equipment and supplies.

Any final decommissioning plan must be agreed to by the WHOI PMO and approved by NSF.

### **iii. IO Retention of Title**

Under certain circumstances NSF or WHOI may reject title to property or equipment purchased with OOI subaward funds, in which case title would remain vested in the IO. For example, equipment and supplies purchased in support of canceled activities may no longer be required by NSF or WHOI. In such cases, the IOPM shall request disposition instructions (see Section 7.13, Disposition Process, below) for affected property and equipment from WHOI's Property Officer, who will in consultation with the PMO seek disposition instructions from NSF. The IO inventory records shall be updated to reflect the final disposition actions taken for such property and equipment and such updated record shall be submitted to WHOI's Property Officer.

## **6. OOI Property Records**

OOI property records held by WHOI, which include information provided by IOs, along with OOI property records held by each of the IOs at their locations, together constitute the official OOI property records. Each IO's records shall meet or exceed the minimum records requirements prescribed in 2 CFR 200.313, Equipment, and CAFATC, Article 6, unless expressly authorized otherwise in an IO's subaward.

The WHOI Property Officer is responsible for the OOI Property Management Database, which is the official OOI property record. This database is a virtual one maintained by the WHOI Property Officer that consists of a collection of detailed spreadsheets generated by each IO and WHOI. Information to update this database will be provided by the IOs to the WHOI Property Officer, with copy to WHOI's PMO, on no less than an annual basis (see Section 8.1 below entitled Annual Inventory Report).

Electronic and source documents of OOI property, including property and equipment NSF transfers by the OOI 2.0 Award, are to be maintained by IO property personnel in accordance with each IO's approved policies and procedures. All equipment must be listed on the annual inventory in accordance with 2 CFR 200.313 (d)(1), and should retain IO data referencing original acquisition. This inventory listing is to be provided to WHOI on an annual basis or as requested (see Section 8.1, Annual Inventory Report).

It is the responsibility of each IO to ensure that its sub-awardees and subcontractors maintain adequate property management systems to meet the Federal requirements, and provide required property inventory records to their cognizant IO as necessary so that the IO can include these records as part of their annual inventory submission to WHOI.

### **6.1 Purchase Reference**

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To facilitate the reconciliation of IO property records to IO financial records, the property record for each item of property purchased subsequent to the date of the OOI 2.0 Award shall include a purchase reference such as an IO Purchase Order number. Purchase references entered shall be traceable to the IO's purchasing records, which should include the purchase order and backup data including, but not limited to, the purchase request, packing list, final invoice and credit card receipt or other proof of payment, all of which should be located in the purchase order file. For credit card, online, check or petty cash purchases, appropriate transaction data should be maintained in accordance with IO policy and procedure. For each purchase, the applicable IO purchase reference (typically an IO Purchase Order number) must be entered into the IO Property Database/Spreadsheet.

### **6.2 OOI Property Record Availability**

The IOPM should have the ability to generate a hard copy of the current inventory report at all times, as well as a hard copy of a previous time period's report. These reports and all backup documentation, including but not limited to purchase documentation, will be made readily available for any WHOI employee or representative of the Federal Government who wants to inspect them.

### **6.3 OOI Property Record Retention**

OOI property records held by IOs and corresponding supporting documentation are official accounting records for the expenditure of federal funds, and will be retained in an active records file pending completion of the IO subaward under the OOI 2.0 Award, at which time such records may be reviewed by WHOI and/or the Government. These records may subsequently be retired with other subaward documentation, where they will be retained for a period of at least four (4) years after final disposition of equipment or project closeout, whichever is later, or for property that NSF has transferred to WHOI, submitted to WHOI at its request. Records that may be transferred may include but are not limited to purchase requests, purchase orders, authorization requests and approvals, receipts, inventory verification from field site visits, acceptance documents, vouchers for reimbursement, and maintenance schedules.

## **7 Procedures**

### **7.1 Acquisition**

Acquisition is the process of acquiring property either by purchase or by transfer. Equipment and property purchased for use on the OOI project will be purchased only by authorized IO officials in strict accordance with the procurement standards found at 2 CFR 300.318-326, the procurement policies and procedures of the IO making the purchase, as well as the terms, conditions and clauses of the IO's OOI subaward agreement. IO procurement officials shall also ensure that all appropriate purchase order/subcontract terms, conditions, and clauses from its OOI agreement are flowed down to vendors/contractors so as to protect WHOI's and the Government's interests.

When acquiring replacement equipment, an IO may wish to use the equipment to be replaced as trade-in, or sell the equipment and use the proceeds to offset the costs of the replacement equipment. In such cases IOs should follow applicable disposition requirements under the subaward and their approved property management policies and procedures to request WHOI approval to proceed accordingly, and may do so upon receipt of such approval.

### **7.2 Receiving, Inspection Acceptance and Identification of Property**

All equipment, material, and supplies acquired by IOs for OOI, whether by purchase or by transfer, will be received, inspected and accepted in accordance with the IO's approved policies and procedures. The IOPM, in accordance with IO property management policies and procedures, must then identify the proper classification for the incoming property. OOI property could fall into one of two classifications, but predominantly has fallen into the first below:

- Recipient or subrecipient owned: Property and equipment procured directly with program funds acquired by and conditionally titled to an IO, or transferred by NSF to WHOI under

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award the OOI 2.0 Award, or

- Government owned: Property owned or furnished to WHOI by the U.S. Government.

Once property or equipment is received, inspected and accepted by the IO, and the IO has properly identified who holds title to the property by the acquiring entity (IO, WHOI or the U.S. Government), the IOPM or the IO Project Property Custodian should mark, tag and/or segregate it in accordance with the IO's approved property management procedures and these OOI policies and procedures.

### 7.3 Tagging

All OOI property at the \$5,000 threshold and above, are to be assigned a unique identifying property number via an asset tag that distinguishes it from controlled property or equipment owned by the IO or other entities. Numbers shall be assigned in accordance with each IO's approved policies and procedures. WHOI shall assign numbers for equipment and property transferred by the OOI 2.0 Award. These assigned numbers and all other pertinent information regarding the property must be entered into the IO's property records for tracking and reporting purposes and included in the IO's annual inventory submission to WHOI (see Section 8.1, Annual Inventory Report).

These unique identifying numbers are to be "tagged" to – clearly marked on or affixed to – each item of property in accordance with the IO's approved policies and procedures using its own distinct bar code label or metal tag reflecting the categorization under Section 7.2 and the IO-assigned, or WHOI-assigned, unique identifying number. Where bar code labeling or metal tags are not feasible, property identification markings may be etched or engraved into the property. The markings or bar code labels or tags will be attached to the property in a prominent location that is visible (when possible) at all times. RFID devices are preferred in lieu of markings when bar code labels cannot be furnished or applied. Very small, delicate or precision items to which it is not possible to apply an identification tag or label should be marked accordingly in the inventory records in compliance with IO policy and procedure, with all other pertinent information entered into the property records. Auxiliary and accessory items that are easily separated from the main item and having a value of \$5,000 or greater should be tagged and recorded in accordance with IO policy and procedure.

All property must remain identified in compliance with these requirements as long as it is in the custody, possession, or control of WHOI, any IO, or their subawardees or subcontractors. Such identification will only be removed or obliterated from the property when the equipment is scrapped, disposed of, or when transferred to an unrelated entity using the proper OMB and NSF-compliant transfer or disposal policies and procedures. Should a tag or marking be accidentally or mistakenly obliterated, defaced or removed, the equipment must be retagged to restore and retain the ability to identify the specific equipment.

### 7.4 Sensitive Property

Sensitive property, regardless of its acquisition cost, requires special accountability and is subject to more stringent rules because it is considered to be susceptible to theft, loss, misuse, or conversion to personal use. Sensitive property includes such items as laptop computers, cameras, cell phones, two-way radio equipment and other similar items.

IOs shall manage, tag and store sensitive property in accordance with their approved policies and procedures. IO property management personnel should place particular emphasis on ensuring that:

- Sensitive property is appropriately used for official purposes and not misused;
- Appropriate measures are taken to safeguard sensitive property and protect it from loss, theft, and misuse;

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- Reports for damaged, lost, stolen, and disposed-of sensitive property are generated when necessary;
- Lost or stolen sensitive property is promptly reported to WHOI;
- Departing employees return any and all issued sensitive property;
- Excess, unserviceable, and damaged sensitive property is properly disposed of; and
- Employees are informed of their responsibility for sensitive property management.

Other types of sensitive property are items that are potentially dangerous to the public safety or security if stolen, lost, or misplaced, or that are subject to exceptional physical security, protection, control, and accountability. Examples of this type of sensitive property include hazardous materials or wastes, or precious metals. The IOPM and other project personnel shall ensure that these types of sensitive property are securely stored and marked in accordance with IO policies and procedures, institutional and OOI safety standards, and industry best practice.

### **7.5 Work in Process/Construction in Process**

In the event that construction in process and work in process occurs, materials and components that will become part of a final OOI deliverable that enter the fabrication or construction process shall be recorded in the Property Database as Work in Process (WIP) or Construction in Process (CIP) inventory. These materials and/or component parts must be inventoried and reported to WHOI until the final fabricated item is completed and accepted. Upon acceptance of the finished item, the materials and component parts are removed from the inventory and the finished items are added to the inventory in their place and are reported to WHOI.

### **7.6 Inventory**

IO's shall inventory OOI property/equipment at the discretion of and as directed by the WHOI PMO. At a minimum, inventories will be conducted annually and at subaward completion or termination, unless waived by the WHOI PMO. Property should be physically inventoried at its custodial location in accordance with the requirements of 2 CFR 200.313 (d) – at least once every two years – so as to ensure the integrity of the count. Inventory reviews will be designed to achieve the following objectives:

- Verify by sight that recorded property is still on hand and verify part numbers and quantities on hand, excluding deployed equipment;
- Confirm or determine current location and custodial responsibility for property;
- Identify unrecorded property which qualifies for control as OOI property or equipment and record it as provided herein;
- Locate or identify missing property; and
- Identify equipment in need of repair or rehabilitation.

As required by 2 CFR 200.313 and in accordance with IO policies and procedures, IO property personnel will take action to investigate and resolve any discrepancies between quantities determined by the inventory and those shown in the IO's property and accounting records. This can include reviewing physical counts for mistakes and by checking for posting errors. If a record can be corrected due to the error being found, or if the item is located after the initial physical inventory, the inventory record will be updated. A previously unidentified item that is located during

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inventory (and for which there is no corresponding record) will be properly identified as “Found Equipment;” a record of the item will also be established and authorization for use will be obtained from the OOI WHOI Property Officer. If authority to use the newly found equipment is not provided, the IOPM will take custody of the item and begin the process of disposition in accordance with the IO’s property management policies and procedures, NSF Award terms and conditions, PAPPG Property Management Standards, and 2 CFR 200.310-.316.

### **7.7 IO Property and Equipment Utilization**

IO utilization of all OOI property in its custody shall be consistent with their approved policies and procedures, the requirements of 2 CFR 200.313-315, and the terms of their WHOI OOI subaward. OOI property items not required for performance of the subaward will be declared excess in a timely manner. The IOPM will request authorization from the WHOI Property Officer to use equipment for non-OOI purposes and, where applicable, pay appropriate rental charges to WHOI and/or the Government, for use of OOI equipment for non-OOI purposes. Evidence of WHOI’s authorization will be retained in the property file. See Section 7.13, Disposition, below for further detail regarding disposition of excess property.

### **7.8 Equipment Movement**

When item(s) have been delivered, inspected and determined acceptable by the IOPM or other designated receiving official and have been entered into the IO’s property database and appropriately tagged, the items should be delivered to the appropriate workstation or to the IO employee to whom the items are addressed. Item(s) shall be accountable to the assigned custodian, and reasonable effort made to confirm the custodian at the time of annual inventory. A permanent movement of assigned property outside the IO must be properly recorded in the IO’s property management system. The IO will maintain a record of the authorization to move property. Applicable IO procedures will be followed in each instance. Property records will be updated to reflect movement or custodian changes, when applicable.

The IOPM will designate, in writing, individuals who are authorized to remove OOI Property from IO facilities. IOs will exercise sound business and safety practices when moving property (i.e. packing, covering, transport protective measures for sensitive, specialized equipment when warranted, use of insured shipping methods, etc.).

### **7.9 Storage**

OOI property will be stored in clean, orderly and secure areas conforming to the appropriate environmental controls for temperature, humidity, and electrostatic discharge, as required for proper care of the property.

Property which is not being utilized daily will be kept in a secure location at the IO office facility or project site, as applicable, while larger items not suitable for such storage will be kept at off-site locked storage units or the project site where the items will be used.

### **7.10 Maintenance and Warranty**

IO’s shall ensure that preventive maintenance of OOI property is performed in accordance with the frequencies and procedures recommended by the original equipment manufacturer and/or IO policies/procedures. IO maintenance staff or authorized vendor maintenance personnel will perform hardware preventive maintenance.

Each IO will manage warranty and maintenance contracts. As warranty/maintenance expiration dates approach, the IO will determine the level of follow-on maintenance support required, select the maintenance source, and initiate actions necessary to renew maintenance support coverage. Copies of warranty and maintenance support purchase orders and calibration/repair records will be provided by technical staff and/or IO OOI Project Staff to the IO OOI property management

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system administrator in accordance with IO property management policies and procedures. .

### **7.11 Insurance**

The organization having possession, custody and control of the property and equipment acquired with OOI funds shall provide the appropriate insurance coverage in accordance with 2 CFR 200.310 (Insurance Coverage) in accordance with the organization's policies and procedures and any specific subaward or subcontract requirements. Such property insurance requirements do not apply to deployed property and equipment.

### **7.12 Reporting Loss, Stolen, Damage or Destroyed Equipment**

If property is not located during the inventory process or is discovered missing, a thorough search for the missing item will be undertaken in accordance with IO policies and procedures. If the item still cannot be located, the record will not be updated as physically inventoried and the item will be presumed "lost" and reported to the WHOI Property Officer as described in Section 8.3 below, Reporting Loss, Theft, Damage, and Destruction (LTDD) of OOI Property. Adjustment to the IO inventory records for LTDD property cannot be made until authorization is received from the WHOI Property Officer. LTDD items must be reported to the WHOI Property Officer to permit reporting to NSF through the CPIR system and ensure NSF's ability to issue disposition action.

### **7.13 Disposition Process**

Disposition means the process of disposing of OOI-funded property. Disposition may include NSF's relinquishment of its reversionary interest in property that is conditionally titled to WHOI or the IO as detailed above. No disposition action may be taken until the proposed disposition is reported to NSF and NSF's disposition instructions are received. Under NSF's award terms and conditions, WHOI complies with NSF's requirement for use of its CPIR system for Federally-owned property and for Recipient-titled property. In the case of Recipient-titled property, such as the OOI project, the WHOI Property Office will submit disposition requests and lost item reports in the CPIR system for disposition during the award and will also submit a final inventory report. Disposition encompasses the identification and declaration of excess and lost or stolen property, and as applicable, its reutilization, redistribution, salvage, scrap, and disposal. Risk of loss or damage to equipment shall remain with each IO as custodian of OOI equipment until disposition of such equipment is complete.

#### **i. Routine Disposition**

In addition to the ongoing maintenance requirements of the property record and the Annual Inventory Reporting discussed in Section 8.1 below, IO's are responsible for notifying the WHOI OOI Program Manager when property in IO custody is taken out of service for any other reason. Any OOI property that has been determined to be excess or out of service must be reported to the WHOI Property Officer. The IOPM will conduct a physical inventory of the identified property and will check its WHOI subaward for existing disposition instructions and, if present, follow those instructions.

If the subaward does not contain such disposition instructions, the IOPM will request disposition by generating and submitting a written request for disposition instructions to the WHOI Property Officer. Approval by WHOI requires the signature of the WHOI Property Officer. Once approved, the IOPM will initiate action to dispose of the excess/residual property, including updating the property records. Identification tags will be removed or obliterated from the OOI property.

#### **ii. Disposition of Systems and Subsystems**

As a part of the OOI Supply Support element, O&M personnel will establish a Disposal Process to ensure that any OOI system or subsystem that has reached its useful end-of-life stage is sold or redirected to appropriate recipients, or disposed of in

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an environmentally safe and sound manner. Complete support subsystem disposal will also ensure the affected items are phased out of use and all aspects of the disposed system are removed from inventories including manual, electronic systems and configuration management items. The Disposal Process is an O&M deliverable, the development of which is managed by WHOI.

### **iii. Selling Excess Property**

In circumstances where WHOI and/or the Government authorizes an IO to sell excess WHOI or Government property, the sale will be recorded and receipts will be filed in the property file. IOs will use selling methods in compliance with the property standards identified in Section 1 above. Any proceeds made from the sale will be passed along to WHOI and/or the Government, as applicable (i.e. credit invoice). In no circumstances will IOs make a profit on any sale of Government property.

For equipment with a current per unit fair market value of \$5,000 or more, IOs may retain the equipment for other uses provided that NSF authorizes such disposition action, or that compensation is made to WHOI and/or the original Federal awarding agency or its successor. The amount of compensation shall be computed by applying the percentage of WHOI or Federal participation in the cost of the original project or program to the current fair market value of the equipment. If there is no need for the equipment, IOs will request disposition instructions from WHOI and WHOI will in turn seek disposition instructions from NSF. If disposition instructions are not issued within 120 calendar days after the request, the IO will sell the equipment and reimburse WHOI and/or the Federal awarding agency an amount computed by applying to the sales proceeds the percentage of WHOI or Federal participation in the cost of the original project or program less \$500 or ten percent of the proceeds, whichever is less, for the IO's selling and handling expenses.

Pending final disposition, IOs will continue to be responsible and liable for the care/control of OOI property and equipment in accordance with subaward agreement terms.

### **7.14 Close-Out**

Within ninety (90) calendar days of the expiration of an IO's OOI subaward, the IOPM shall submit to the WHOI OOI PMO and Property Officer an inventory listing all property purchased or furnished under its OOI subaward regardless of ownership, including a list identifying all discrepancies disclosed by a physical inventory. The IOPM will work with IO program staff to resolve inventory adjustments, liability determinations, and other property issues required to close the subaward. The report shall also reconcile all property and equipment expenditures under the subaward to ensure that they match the IO's financial records.

Where necessary, the IOPM may request that title be transferred to the IO, or that WHOI provide final property and equipment disposition instructions from the WHOI Property Officer. Where the request to transfer title to the IO is denied, the IOPM shall carry out the WHOI Property Officer's final disposition instructions by either:

- Returning the equipment to WHOI, NSF or any other entity designated by the WHOI Property Officer; or
- Disposing of or selling the equipment and ensuring that the IO credits the net proceeds of any such disposal or sale to the subaward or to WHOI or NSF, as instructed; or
- Continue to use the equipment on additional research within the IO while WHOI or NSF retains title to the equipment.

The IOPM shall inform the WHOI Property Officer when final disposition has been completed



(see Section 8.5 below).

## **8 Reports**

In order for WHOI to provide property and equipment oversight as required by 2 CFR 200.313 and the terms of its NSF cooperative agreement for OOI, it is essential that WHOI and IO property management and program staff ensure that the reports listed below are timely submitted and are complete, accurate and current when submitted. The WHOI OOI Program Manager and/or the WHOI Property Officer shall follow up with the IOPM if WHOI does not receive this information as required.

### **8.1 Annual Inventory Report (including WIP/CIP, if any)**

#### **i. Schedule**

IO's are responsible for preparing and submitting to the WHOI Property Officer complete up-to-date annual inventory reports and to support preparation of any reporting required for submission to NSF. The OOI inventory reporting period for IO inventory preparation and submission purposes is a twelve-month period from October 1 through September 30th of the following year. As such, each IO's inventory report must cover and include property data for that period, including updates and additions/deletions. The following timeline **must** be adhered to:

- IOs must submit their cumulative inventory report to the WHOI Property Officer and the WHOI OOI O&M Program Manager by **not later than September 15th** of each reporting year;
- The WHOI Property Officer will review the property data submitted by the IOs and, in collaboration with the WHOI Senior Contracts Officer, Grant & Contract Services and the cognizant IOPM, reconcile any issues identified; and
- The WHOI Property Officer will consolidate its and the IOs' inventory reports into one OOI inventory report and retain the consolidated report each year for record purposes or reporting as required under NSF terms and conditions or the direction of the NSF Program or Grants & Agreements Officer.

#### **ii. Content**

IO inventory reports shall include 1) the name and title of the individual who performed the inventory, 2) the relevant award number under which the property is accountable, 3) the inventory completion date, and 4) the total dollar value (original acquisition cost), and 5) quantity and condition of inventoried items by type of property. The equipment descriptions shall permit, at minimum, data sorts on the basis of array, platform, or subsystem configuration. Reports provided to WHOI may be in the IO's preferred format, as long as the following information required by 2 CFR 200.313 is included:

- Unique Identifying Number; (or, if applicable, WIP/CIP);
- A description of the equipment;
- Quantity;
- Manufacturer's serial number, model number, Federal stock number, national stock number, or other identification number;
- Source of the equipment, including the award number;
- Purchase Order Number(s);

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- Whether title held by the IO, WHOI or the Federal Government;
- Acquisition date (or date received, if the equipment was furnished by the Federal Government);
- Unit Acquisition cost;
- Percentage of Federal participation in the cost of the equipment (not applicable to equipment furnished by the Federal Government);
- Location;
- Condition of the equipment;
- Date that condition information was reported;
- Disposed (yes/no);
- Method of disposal (if applicable); and
- Sale Price (if applicable).

As noted in Section 6.1, Purchase Reference, above, IO inventory reports must also include a purchase reference. To ensure that property and equipment transferred under the OOI 2.0 award are appropriately tagged, IO inventory reports shall also indicate whether a supplemental "Property of WHOI" tag is required and has been affixed to each item.

### **iii. Reporting Process for WIP/CIP Property (IF APPLICABLE)**

In accordance with Article 8(a) of NSF's CA-FATC (Transfer of Project Effort), materials and/or component parts must be inventoried and reported on the annual property report to be submitted to NSF as Work in Process (WIP)/Construction in Process (CIP) Government property until the final fabricated item is completed and accepted by WHOI and the Government. Upon final acceptance of the finished item, the materials and component parts are removed from the inventory and the finished item is tagged and added to the inventory in its place as a fabricated item. The item is reported to WHOI as Government furnished property, and the IO property record is annotated to show WHOI as having title to the property.

## **8.2 Reporting on New Property Acquisitions**

So that WHOI may exercise proper oversight over purchases made after the OOI 2.0 award, IOs shall include in their quarterly progress reports updates on purchases made against periodic procurement plans, and annual procurement plans submitted with their final annual work plan submissions, and also update the plan lists to indicate unforeseen requirements and/or changes.

For each item of new property listed in the annual inventory reports, IOs shall also ensure retention and reference to purchasing information as listed in Section 6.1, and make such information available as provided under Section 6, OOI Property Records.

## **8.3 Reporting Lost, Stolen, Damaged, or Destroyed Equipment**

The IO Project Property Custodian is responsible for reporting loss, theft, damage or destruction (LTDD), Out of Service, Excess and other property status, reporting to both the IOPM as well as the WHOI Property Officer and PMO. If OOI property is lost, stolen, damaged, or destroyed, the IOPM or IO OOI Property Custodian will notify the WHOI Property Officer and will promptly (i.e.

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not less than 10 days following identification of the event, or sooner if so defined by Institution's Policies and Procedures) follow up with a written report to the WHOI Property Officer. IOs should follow their institution's policies and procedures for LTDD, out of service and excess property reporting, but such reports shall at minimum include:

- Date of the incident (if known);
- Description of items lost, damaged, or destroyed or otherwise out of service;
- Tag number or other identifying information;
- Explanation of the circumstances surrounding the LTDD, including last known location of the property;
- Cost of property lost, damaged, or destroyed;
- In the case of damage, the cost of repairs (if actual costs are not known, reasonable estimates will suffice);
- Cause of the LTDD and any actions that could be taken to prevent LTDD in similar situations;
- Other facts or circumstances relevant to determination of liability and responsibility for repair or replacement;
- A statement that the Government will receive any reimbursement covering the loss, damage, destruction, or theft, in the event the IO was or will be reimbursed or compensated;
- Copies of all supporting documentation; and
- A statement that the property did or did not contain sensitive or hazardous material, and if so, that the appropriate agencies were notified.

The LTDD report will be maintained as part of the official property record(s).

### **8.4 Property Disposition Reporting**

Once property has been properly disposed of consistent with any NSF-issued disposition direction (see Section 7.13, Disposition Process, above), the IOPM or other designated official will provide copies of the supporting documentation to the WHOI OOI Program Manager and the WHOI Property Officer. Such documentation will reflect the disposition authorization, disposal action, disposal date, and indicate the transaction number that shows the disposal has been posted to the official record of the item.

### **8.5 Property Closeout Report**

As discussed in Section 8.1 above, within ninety (90) calendar days of the expiration of an IO's WHOI subaward, the IOPM shall submit to the WHOI Property Officer an inventory listing all property purchased or furnished under the subaward or subcontract regardless of ownership, including a list identifying all discrepancies disclosed by a physical inventory. The report shall also reconcile all property and equipment expenditures under the subaward to ensure that they match the IO's financial records. The IOPM shall submit an updated report to the WHOI Property Officer that indicates the completion of disposition of all property accountable under its OOI subaward once such disposition has been accomplished.

## **9 Audits**

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It is expected that IOs will conduct property and equipment self-audits annually and that corrective actions will be taken in the event of any deficiencies. Copies of the results of these audits and corrective actions will be forwarded to the WHOI Property Officer. In addition, the WHOI PMO, or designee, will conduct periodic property audits. Such audits will be conducted to verify that property administration procedures are being followed, are effective, and that inventories are being conducted in a manner that results in accurate accountability.

## APPENDIX 1

### OOI Property & Equipment Procedure Checklist

(OOI Property Management Plan)  
[WHOI Property Management Policy]

Topic	Reference	Requirement	Assessment
Acquisition	OOI PMP Section 7.1	Did the Institution-level Property Manager seek approval, if required, from WHOI for equipment, material or supplies to be purchased?	
Acquisition	OOI PMP Section 5.1	If yes, does the equipment, material or supplies conform with the applicable subcontract or subaward terms and conditions, quality, quantity, performance, and specification requirements of the project?	
Acquisition	OOI PMP Section 5.1	Was approval granted or denied?	
Records	OOI PMP Section 6 and 6.2	If required, did the WHOI Property Officer receive a copy of the annual IO property record including newly acquired, received and identified equipment, material or supplies? If not, the WHOI Property Officer shall request it from the IO.	
Records	OOI PMP Section 8.1	Did the IO Annual Property Record include the information set forth in Section 8.1.ii of the OOI Property Management Plan? If not, the WHOI Property Officer must direct the IO to add the missing information and to confirm that the adjustment has been made.	
Database	OOI PMP Section 6	Have newly acquired pieces of equipment, material or supplies been incorporated into the OOI Property Management database?	
Property Management	OOI PMP Section 7.8 and 7.13	If any piece of property has been taken out of service for other than routine or annual maintenance or refurbishment, did the IOPM timely inform the WHOI Property Officer?	

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Property Management	OOI PMP Section 6	Has this information been incorporated into the WHOI/OOI Property database? If not, the WHOI Property Officer must ensure that the necessary entry(ies) are made.	
Movement	OOI PMP Section 7.8	If requested, has the IOPM notified the WHOI Property Officer of permanent movement of property?	
Movement	OOI PMP Section 7.8	If yes, has the WHOI Property Officer or PMO added this information to the OOI Property Management Data system?	
Storage	OOI PMP Section 7.9	If placed in storage by the IO, has the IO provided location details of the piece of equipment, materials or supplies?	
Disposal	OOI PMP Section 7.13	Has the IO requested and received permission to dispose of a piece of property in the form of a Letter of Disposition or written Disposition Instructions?	
Disposal	OOI PMP Section 7.13	If so, does permission follow 2 CFR 200.311 requirements and guidelines?	
Disposal	OOI PMP Section 7.13	Has any property been reported as excess?	
Disposal	OOI PMP Section 7.13	If so, does permission or direction follow 2 CFR 215.311 requirements and guidelines?	
Disposal	OOI PMP Section 7.13	Do items being reported as excess follow requirements for disposition of the property?	
Disposal	OOI PMP Section 7.13	Has supporting documentation for items being reported as excess been provided to the WHOI Property Officer by the IO?	
Close-out	OOI PMP Section 7.14	Before a property element of a subaward or subcontract can be closed, a full inventory of the OOI equipment must be conducted. Has this been completed?	
Close-out	OOI PMP Section 8.5	Send the full inventory to the WHOI Property Officer.	

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Close-out	OOI PMP Section 7.14	Request disposition instructions from the WHOI Property Officer.	
Close-out	OOI PMP Section 7.14	Document disposition instruction and subsequent disposition action of equipment and enter information into the OOI Property Management Database.	
Physical Inventories	OOI PMP Section 7.6	Has the IO conducted a physical inventory in accordance with 2 CFR 200.313(d)? If no, one must be conducted.	
Physical Inventories	OOI PMP Section 7.6	Were any discrepancies between physical inventory and property records reported?	
Physical Inventories	OOI PMP Section 7.12	Did IO report to the WHOI Property Officer instances, if any, of lost, damaged, stolen or destroyed property?	
Physical Inventories	OOI PMP Section 8.3	If yes, was this report added as part of the official property records?	