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# WEST VIRGINIA CLINICAL & TRANSLATIONAL SCIENCE INSTITUTE

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## Hospitality

### Overview

The West Virginia Clinical & Translational Science Institute may provide food, non-alcoholic beverages and related expenses for guests of WVCTSI or for WVCTSI events in accordance with the initiatives of the institute. WVCTSI has established guidelines for these hospitality expenditures to remain compliant with institutional, state, federal and granting agency regulations.

### Purpose

The purpose of this standard operating procedure (SOP) is to clearly communicate the allowable hospitality expenses using WVCTSI funds.

### Scope

This policy applies to all WVCTSI directors, investigators, core chairs, core vice-chairs, scholars, researchers, staff, core constituents and partner sites who use WVCTSI funds for hospitality expenditures.

### Clarification

All hospitality requests must be coordinated through the WVCTSI Finance office and approved by the Director of Research Administration of WVCTSI.

Please note that the following are **allowable** expenses:

- Meeting with external parties (i.e. vendors, guests, consultants, or other individuals from other geographic locations) for specific business purposes on a non-routine basis.

- Meeting with a candidate or potential candidate for an CTSI-supported position. A non-routine event hosted by WVCTSI, a WVCTSI Core(s) including all and specifically planned for participants of a conference, recognized standing committee, seminar, workshop, or similar event. Employees may attend as registered attendees, host, or as assigned supporting staff.
- Meal (but not entertainment) expense for WVCTSI employees and outside reviewers required for accreditation activities and peer or administrative reviews.
- Meals for individuals invited as visitors to contribute to the intellectual life of the WVCTSI community. Normally such visitors will deliver a seminar, colloquium talk, or other lecture (or performance in the case of creative activity) for the benefit of WVCTSI researchers faculty, personnel, and/or students.
- Formally organized business meetings involving multiple business units and/or WVCTSI Cores. To qualify, a meeting must be of at least one-half day duration and an agenda must be prepared. Please note: this does not include meetings held only over the lunch hour.

The following are **unallowable** expenses:

- Normal staff or departmental meetings, including a regularly scheduled meeting (i.e. weekly, monthly, once per semester, etc.) or employee training events.
- Meal expense incurred during a one-day business trip
- Employee only social gatherings, such as:
  1. Anniversaries
  2. Birthday Parties
  3. Employee Recognition/Awards
  4. Going Away/Retirement Parties
  5. Holiday Parties
  6. Promotion Parties

## **Definitions**

**Chairs/Vice-Chairs:** persons named as leaders of WVCTSI core activities

**WVCTSI Staff:** staff members reporting to the WVCTSI cores

**Core Constituents:** a member of a WVCTSI core who participate in the activities of the institute

**Principal Investigator (PI)/Researcher:** a person in charge of conducting research

**Scholar:** a person who develops and conducts mentored, clinical and translational research for WVCTSI

**Partner Sites:** WVCTSI staff members at Charleston Area Medical Center and School of Osteopathic Medicine who are named within the WVCTSI grant and contribute effort.

**Agencies:** West Virginia University, West Virginia University Research Corporation, West Virginia University Healthcare doing business as WVU Medical Corporation or University Health Associates, Charleston Area Medical Center, WV School of Osteopathic Medicine

## Policy

Each WVCTSI member is responsible for following the policy of WVCTSI for all hospitality processes. All hospitality related expenditures using WVCTSI funds must be coordinated through the WVCTSI finance office.

## Procedures

Hospitality request must abide by all institutional and state hospitality policies (WVU-PS-7)

All charges must include:

- 1) A written business purpose on the completed hospitality form
- 2) An original itemized receipt
- 3) A list of attendees and relationship to WVU and WVCTSI
- 4) Approval for hospitality by PI/Director of WVCTSI

For WVU WVCTSI personnel, the preferred method of payment for hospitality is via a WVU or WVURC procurement card. However, WVCTSI will pay for an approved hospitality event via direct pay or employee reimbursement. For partner organization, the funds for budgeted hospitality expenses will be reimbursed via subcontract invoice payments.

All submissions will be reviewed by the WVCTSI Financial Manager prior to payment.

All SOP interpretation as well as development rests with WVCTSI Director of Research Administration.

### WVU/WVURC Forms

**Hospitality Form #PCPS Form 004** located at:  
<http://financediv.wvu.edu/home/pcps/payment-services>

## **Roles and Responsibilities**

Principal investigators, chairs, vice-chairs, WVCTSI staff and WVCTSI sponsors are responsible for abiding by this policy and its accompanying procedures. In the event of an audit, it will be the responsibility of the sponsor, the researcher and the WVCTSI finance office to supply all required supporting documentation for hospitality payments made by WVCTSI awards. Sponsor must retain supporting documentation until at least June 30, 2020.

The responsibility for interpretation of this policy rests with the Director of WVCTSI.

## **References and Authority**

- WVU-PS-7 Hospitality Policy
- WVU Administration and Finance Policies including Payroll & Tax, Financial Services, and Business Services located at: <http://adminfin.wvu.edu/policies>
- WVU: WV State Code §18B-5-9; WVU Purchasing Manual
- WV Ethics Act (code of conduct for all public servants)

The cost principles are set forth in the following documents and are incorporated by reference in 45 CFR parts 74.27 and 92.22. As noted below, OMB Circulars A-21, A-87 and A-122 have relocated to Title 2 in the Code of Federal Regulations (2 CFR) :

- OMB Circular A-21 (relocated to 2 CFR 220) — Cost Principles for Educational Institutions.
- OMB Circular A-87 (relocated to 2 CFR 225) — Cost Principles for State and Local Governments and Indian Tribal Governments.
- OMB Circular A-122 (relocated to 2 CFR 230) — Cost Principles for Non-Profit Institutions. Larger non-profit organizations that are specifically listed in Attachment C to OMB Circular A-122 are subject to the Federal cost principles applicable to commercial organizations (48 CFR 31.2) rather than to the cost principles for non-profit organizations.
- 45 CFR 74, Appendix E — Principles for Determining Costs Applicable to Research and Development under Grants and Contracts with Hospitals.
- 48 CFR 31.2 (Federal Acquisition Regulation) — Contracts with Commercial Organizations.

# Approval and Authority to Proceed

I approve the project as described above, and authorize to proceed.

Name	Title	Date
Sally L. Hodder, MD	Director, West Virginia Clinical and Translational Science Institute	4/18/2016



Approved By

4/18/16

Date