

# STAR PROGRAM LOGISTICS

STAR Certificate consists of 11 courses. To obtain a certificate, you must complete all 11 courses within two (2) years.

During this pandemic, the two year period has been extended. Please reach out to [training@research.ucsb.edu](mailto:training@research.ucsb.edu) for any exceptions.

For any STAR Program questions: contact Hilda Vasquez and/or Clarissa Cabrera at [training@research.ucsb.edu](mailto:training@research.ucsb.edu)

Zoom Classes will not be recorded for this 2022 series.

Reminder to complete the STAR Evaluation. Emailed to registered participants via UCLC.

# Star Course #7

## Financial Management

### Part A

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Accounting  
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# Extramural Funds Accounting

- **Extramural Funds Accounting (EMF) is the accounting unit within Business and Financial Services responsible for external research funds & UC Programs**



# Topics

- I. **Establishing Awards**
- II. **Direct Costs**
- III. **Indirect Costs**
- IV. **Budget Transfers**
- V. **Cost Transfers**
- VI. **Overdrafts/Credit Balances**



# I. Establishing Awards

- Award Processing
- Chart of Accounts
- Request for Approval to Spend Funds (RAS)

# Award Processing

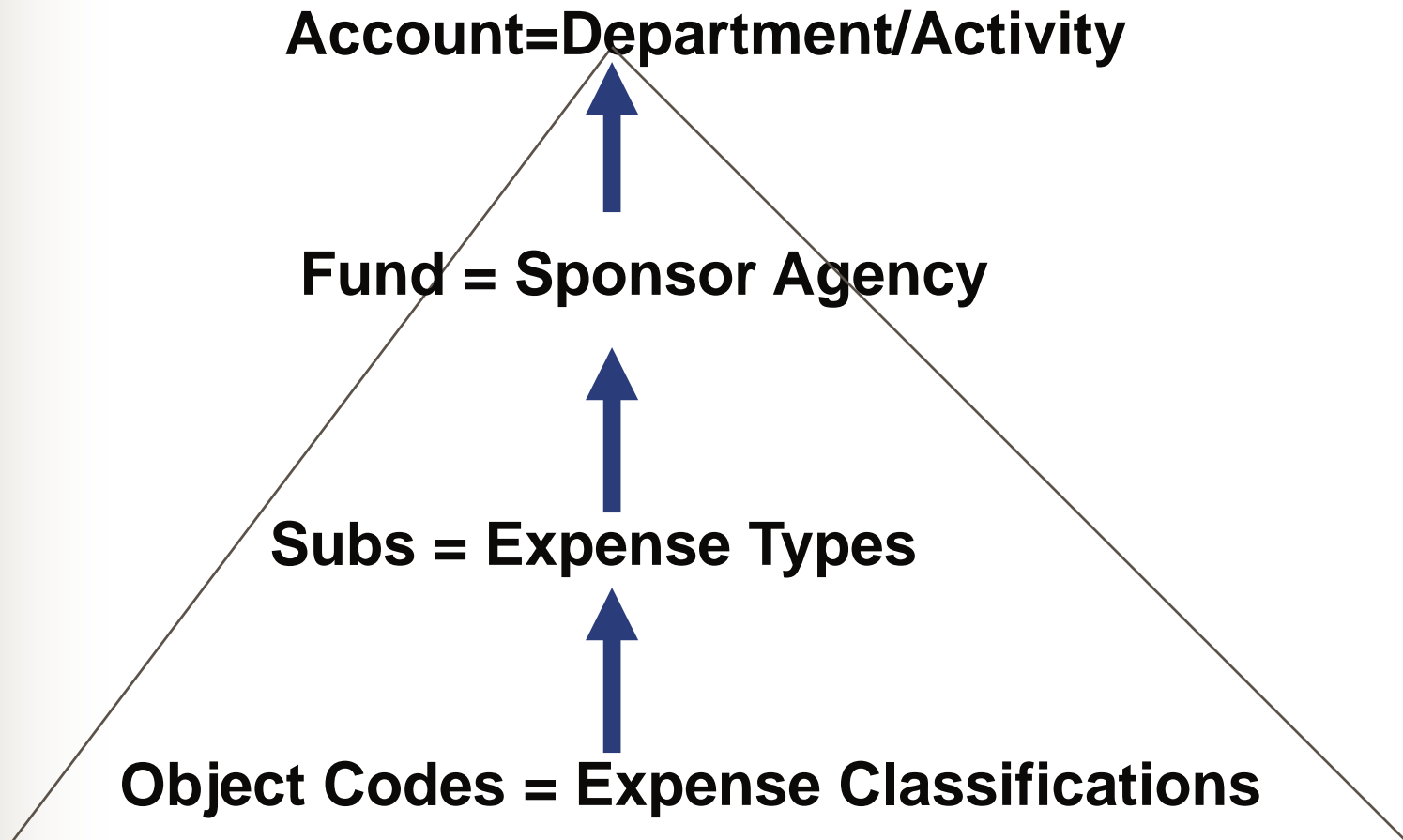
- Awards are received in EMF (post award) via the Office of Research (pre award) database referred to as ORBiT.
- Award set up priorities in EMF are given to request for Approval to Spend (RAS) & New awards.
- New awards and existing awards with new agency award #'s are given a new fund number. **Each award has it's own unique fund number.**



# Award Processing

- **UCPath** is updated nightly for new accounts, new fund numbers, and awards extending the end date.
- **ORBiT** is updated by EMF with budget data, account, fund; then the information is disseminated to departments and principal investigators via an email.
- Budgets and account information (once established) are imported by EMF into the financial system's **UCSB Chart of Accounts** via ORBiT. Departments are sent the award's **account-fund** info by EMF so they can begin spending.

# Chart of Accounts Hierarchy







# Chart of Accounts

- **Accounts** are designed to reflect specific institutional activities (i.e. instruction, research, public service, student financial aid, etc.). Assigned to a department.
- **Funds** are established to ensure accountability and expenditure for designated purposes. Each fund is a separate entity requiring a self-balanced group of accounts, having its own assets, liabilities, revenue, expenditures, and balances. Assigned to a particular award.
- **Subs** classify types of expenses by broad budget category. Extramural funds are established with the standard subs 2, 3, 4, 5, 6, 7, 8, and Y.
- **Object Codes** are used for the classification of expenditures. It provides a more detailed breakdown than a sub & audited.



## Request for Approval to Spend Funds (RAS)

- Circumstance when a principal investigator of a project request permission to spend funds **in advance** of the University's receipt of an anticipated award in support of the project. Contact the designated Sponsored Project Officer for assistance.
- Training is offered in Star Class #3.

<https://www.research.ucsb.edu/spo/award/preaward-spending>



## II. Direct Costs

Covered in Several Policies:

- **Uniform Guidance** (formerly OMB Circular A-21, A-110, A-133)
  - Federal Policy
- **Business Finance Bulletin A-47**
  - U.C. Policy
- **Departmental Costing Guidelines**
  - UCSB Policy



## Uniform Guidance: Direct Costs

- Direct Costs are those costs which:
  - -can be identified with a specific sponsored project or institutional activity ;
  - -can be directly assigned to activities relatively easily with a high degree of accuracy;
  - -costs incurred for the same purpose in like circumstances must be treated either as a *direct* or *overhead* costs. That is – they have to be treated consistently in all circumstances.



## Direct Costs

- Typical Direct Costs:
  - ✓ salaries & wages;
  - ✓ fringe benefits;
  - ✓ materials;
  - ✓ services from specialized facilities or other institutional service operations;
  - ✓ other items of expense necessary to meet the deliverables for the project.
  
- Must meet the **allowable, allocable, and reasonable** test stipulated in Star Class #2.



## Business Finance Bulletin A-47: Direct Costing (UC Policy)

### Three **types** of Direct Costs:

1. direct charge or payment of an **original** transaction (i.e. payroll);
2. an expenditure **adjustment** from an account originally charged; and
3. a recharge from an activity providing goods or services.

(Business Finance Bulletin A-47; III. Basic Direct Costing Guidelines: B. Types of Direct Costs or Charges)

# Resources

## ➤ U.C. Policy & Guidelines

- ✓ Business Finance Bulletin A-47

<http://policy.ucop.edu/doc/3420326/BFB-A-47>

## ➤ UCSB Departmental Costing Guidelines

[http://www.bfs.ucsb.edu/sites/www.bfs.ucsb.edu/files/docs/extramural\\_funds/Guide%20to%20Allowable%20Costs%20%28final%29.pdf](http://www.bfs.ucsb.edu/sites/www.bfs.ucsb.edu/files/docs/extramural_funds/Guide%20to%20Allowable%20Costs%20%28final%29.pdf)

## Uniform Guidance (Federal policy)

[http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl)



### III. Indirect Costs (Definition)

- Facilities & Administration (F&A) is the federal term for Indirect Cost or Overhead.
- The term overhead is usually used to group expenses that are necessary to the continued functioning of the business but cannot be immediately associated with the products/services being offered.





Indirect Costs (Costs Included) are most commonly incurred on awards using a MTDC Direct Cost base.

- Base: Modified Total **Direct** Costs, consisting of all salaries and wages, fringe benefits (excluding Tuition & Gship), materials, supplies services, travel and subgrants and subcontracts up to the first \$25,000 of each subgrant or subcontract (regardless of the period covered by the subgrant or subcontract).



## Indirect Costs (Costs Excluded)

- Modified Total Direct Costs shall **exclude** equipment, capital expenditures, charges for patient care, tuition remission, rental costs of off-site facilities, scholarships, participant support, and scholarships/fellowships as well as the portion of each subgrant and subcontract in excess of \$25,000.

## Indirect Costs: Excluded Object Codes

- Tuition Remission (8970-1); Partial Fee (8590, 8640)
- Graduate Student Health Insurance Program (8570)
- Equipment: equal or >\$5,000 (9000 series in SUB 4)
- Subcontracts: Excess of \$25K (7300)
- Rent (5000, 5050, & 5100)
- Scholarships & Fellowships (7770)
- Participant Support (2015-16, 7215-17)

# Indirect Costs Charged to an award – Determined by Base Codes

- Base Codes are a group of alpha characters assigned to each account/fund that determines how to assess F&A. The codes will,
  - ✓ identify the sub(s) categories to be excluded from F&A; and
  - ✓ identify what object codes to be excluded.

# Alpha Base Codes Used at UCSB

<u>Overhead Base Code</u>	<u>Description</u>	<u>Subs Generating Overhead</u>
A	Salaries	Sub 2
B	Total Direct Costs	ALL Subs
C	Salaries & Benefits Only	Sub 2,6
D	No Overhead Charged	No Sub
E	Supplies & Expenses	Sub 3
F	Total Costs Except Sub 4	Sub 2,3,5,6,7
G	Stipends Only	Sub 5
J	MTDC* <b>Excluding Sub 4</b> *	Sub 2,3,5,6,7
K	MTDC* (Includes Participant Support)	Sub 2,3,5,6,7
L	MTDC* Excluding Sub 4 & 7	Sub 2,3,5,6
M	Salaries & Benefits (Excluded)	Sub 3,4,5,6,7
N	Excludes Subcontract	Sub 2,3,5,6,7
P	All Sal & Ben- O/H on Fees & GSHIP	Sub 2, 6
Q	Paid Stipends Excl Sub 7 (ONLY for Tuition/Fees)	Sub 3,5

\*See next page for object codes excluded in addition to sub 4 (Equipment)

**\*Modified total direct costs**, consisting of all salaries and wages, fringe benefits, materials, supplies, services, travel and subcontracts up to the first \$25,000 of each sub grant or subcontract (regardless of the period covered by the sub grant and subcontract). Modified total direct costs (MTDC) shall exclude equipment, capital expenditures, charges for patient car, tuition remission, rental costs of off-site facilities, scholarship, and fellowships as well as the portion of each sub grant and subcontract in excess of \$25,000.

# Alpha Base Codes (continued)

## Object Codes Excludes From Indirect Cost

In addition to certain subs being excluded only for overhead calculation, specific overhead codes exclude certain object codes from calculating overhead. The following is a list of overhead base codes that exclude object code from overhead, if the specific base code is assigned to the award.

Example: An award has been assigned a base code of "L"; the following will be excluded form overhead: Subs 4 & 7 and object codes 5000, 51000, 7300, 8570, 8590, 8970.

<u>Overhead Base Code</u>	<u>Description</u>	<u>Object Codes Excluded from Overhead</u>	
C	Grad Student Health Ins. Partial Fee Remission Tuition-Full Fee Remission	8570 8590 8970	<b>8640, 8971</b>
F	Non-Invent'l Equip (1,500-4,999)*	8120	
<b>J</b>	Travel-Participant Support Rental of Space – Interdept Rental of Space-off Campus Participant Support Participant Support – Undergrad Participant Support – Facilitators 3 <sup>rd</sup> Party Costs Excluded fr Overhead Grad Student Health Ins. Partial Fee Remission Tuition – Full Fee Remission	2015 5000 5100 7215 7216 7217 7300 8570 8590 8970	<b>2016, 5050          8640, 8971</b>
K	Rental of Space-Interdept Rental of Space-Off Campus 3 <sup>rd</sup> Party Costs Excluded fr Overhead Non-Invent'l Equip (1,500-4,999)* Grad Student Health Ins. Partial Fee Remission Tuition-Full Fee Remission	5000 5100 7300 8120 8570 8590 8970	<b>5050      8640, 8971</b>
L	Rental of Space-Interdept Rental of Space-Off Campus 3 <sup>rd</sup> Party Costs Excluded fr Overhead Non-Invent'l Equip (1,500-4,999)* Grad Student Health Ins. Partial Fee Remission Tuition-Full Fee Remission	5000 5100 7300 8120 8570 8590 8970	<b>2015, 2016, 5050, 7215, 7216, 7217   8640, 8971</b>
N	3 <sup>rd</sup> Party Costs Excluded fr Overhead 3 <sup>rd</sup> Party Cost Included in OH	7300 7305	

\*This object code is excluded from overhead until June 30, 2003



# Indirect Cost Rate Categories

- Costs that are in the F&A Rate Categories **should not also be directly charged** to contracts or grants.
- **Unallowable & Typically F&A Object Code** Listing is on the EMF homepage website:
  - ✓ <http://www.bfs.ucsb.edu/extramural-funds/awards/typically-fa-unallowables-object-codes>
- Information on Standard Reports are located in Data Warehouse in both Hyperion & EZ Access versions under Sponsored Projects:
  - ✓ <http://wh.isc.ucsb.edu/>

## Indirect Cost Rate

- Current Agreement is from 7/1/2015– 6/30/2021.
- **On-campus Organized Research Rate:**
  - ✓ 7/1/2015 – 6/30/2017: 53.5%
  - ✓ 7/1/2017 – 6/30/2018: 54.0%
  - ✓ 7/1/2018 – 6/30/2020: 55.0%
  - ✓ 7/1/2020 – 6/30/2021: 55.5%
- **Off-campus Rate:**
  - ✓ 7/1/2015 – 6/30/2021: 26.0%



# Indirect Cost Rate Categories

7/1/2018 – 6/30/2020

	OFF CAMPUS RATE	ON CAMPUS RATE
<b><u>Facilities Components:</u></b>		
BUILDING DEPR		7.9%
INTEREST		6.0%
EQUIPMENT DEPR		2.3%
OPERATIONS & MAINT.		11.0%
LIBRARY		1.1%
UTILITY COST ADJUSTMENT		0.7%
<b><u>Admin Components:</u></b>		
GENERAL ADMIN.	3.9%	3.9%
DEPT. ADMIN.	18.7%	18.7%
SPON. PROJ. ADMIN.	3.3%	3.3%
STUDENT SERVICES	0.1%	0.1%
<b>TOTAL</b>	<b>26.0%</b>	<b>55.0%</b>



# Distribution of F&A Recovery

## AGGREGATE INDIRECT COST RECOVERY

Less: Bond Payments and Maintenance and Operation for Garamendi Projects (comes right off the top)

Equals: Adjusted Indirect Cost Recovery available for distribution

Off-the-Top Overhead Fund Contracts & Grant Overhead (69750) (19.9% of Total Pool)

Balance of Indirect Cost Recovery (80.1% of Total Pool)

Private & Other Gov't (05397)

General Fund per Agreement with State (55% of 80.1%)  
Offset to UC Operating budget

To University Opportunity Fund (07427) (45% of 80.1%)



# Indirect Cost Rate Agreement

➤ ***Rate Agreement website link:***

- ✓ [https://www.bfs.ucsb.edu/sites/www.bfs.ucsb.edu/files/docs/extramural\\_funds/Federal\\_Indirect\\_Cost\\_Rate\\_Agreement.pdf](https://www.bfs.ucsb.edu/sites/www.bfs.ucsb.edu/files/docs/extramural_funds/Federal_Indirect_Cost_Rate_Agreement.pdf)



## IV. Budget Transfers

- There are instances when the **budget** submitted to the agency needs to be **modified** to reflect the actual costs incurred by the principal investigator.
- Agency approval may be required prior to incurring a specific cost.
- When doing a TOSF, determine which costs are excluded from indirect costs. The excluded costs will affect the amount to be transferred.



## **Sponsor prior approval required when:**

- Budget changes that result with a major change from the approved **goals or scope** of a project.
- Check **individual agency** and **specific award** guidelines for budget restrictions.
  - Purchase of general purpose equipment not listed in the budget.
  - Deviations that are significant from the line item budgets.



## **Sponsor prior approval required when:**

- Key Personnel activity/participation is to be reduced by more than 3 months or a 25% reduction in time for Principal Investigator or specified project leader.
- Key Personnel listed in the application or Federal award is to change.
- UCSB just very recently made changes in Orbit that now force depts to review and check off in system that they are monitoring this.



# Transfer of Soft Funds (TOSF) System

Transfer of Soft Funds (TOSF) is an enhancement to the current Transfer of Funds System (TOF) developed for specific soft funds (contracts and grants). **The TOSF application is a department system used to prepare budget transfers.** Contracts and Grants are considered SOFT funds, unlike PERMANENT funds. (Contract & Grant funds are usually from outside sources and have a set begin and end date).



# Transfer of Soft Funds (TOSF) System

- **Contracts & Grants will need to use the TOSF application to submit budget transfers. Gifts and endowments are handled under the TOF system.**
- Employee must have an activated LDAP (campus directory) account.
- Employee must have an e-mail account.
- Must be set up with one of the following security groups: **TOF-DB Viewer; TOF-DU Preparer; TOF-RL Approver**
- **The TOSF transfers are not forwarded to Budget Office or EMF for approval. They are directly submitted to the FTD by the departmental approver.**
- TOSF web site is: <http://espresso.ucsb.edu/>



Status: Unprocessed Transfers  
 Period: July 2011-12 To February 2011-12  
 Transfer Number:  Find  
 CP-only  
 CP-all  
 all departments  
 **Contracts & Grants**

<input type="checkbox"/>	<a href="#">Transfer Num</a>	<a href="#">Date Created</a>	<a href="#">Transfer Explanation</a>	<a href="#">Current Year Total</a>	<a href="#">Permanent Year Total</a>	<a href="#">Temporary FTE</a>	<a href="#">Permanent FTE</a>	<a href="#">Created By</a>	<a href="#">Sent By</a>	<a href="#">Inbox Of</a>
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Transfers 0

Done



## V. Cost Transfers

UCSB policy states that costs should be charged to the appropriate sponsored project when first incurred. There are circumstances in which it may be necessary to transfer expenditures to a sponsored project subsequent to the initial recording of the charge (ie, if award is delayed). Those transactions require monitoring for compliance with UC policy, Federal regulations, sponsor specific guidelines, and the cost principles that underlie fiscal activities on sponsored projects.

## Business Finance Bulletin A-47: Criteria for Cost Transfers

1. Relate to individual items of expenditures (payroll hour).
2. Contain reference to the invoice, payroll, or other disbursement that initiated the original direct charge.
3. Match the same expense amount originally recorded (or fraction thereof) in the general ledger.
4. Be explained, justified and approved by administrators that are knowledgeable about the original charge.
5. Must be recorded in the ledger by the appropriate form.
- 6. Transfers must be identified and processed expeditiously prior to 120 days.**

*Note: Escalation Process has been implemented for Federal and Federal Flow-Trough contract and grant cost transfers over 120 days for payroll & non-payroll transfers.*

# Transfer of Expense (TOE) online System

- TOE website : <http://espresso.ucsb.edu/>
- **TOE Instructions:** <https://www.bfs.ucsb.edu/extramural-funds/cost-transfers/transfer-expense-mechanisms>
- Non-Payroll Expense Transfers
- The online TOE application identifies if a transfer is 120 days or older and reject them if they include a contract and grant.
- Will not let transfer to process if one of the fund sources is not within it's Period of Performance.
- The TOE system identifies transfers to a Federal or Federal-Flow-Through fund as “**High Risk**”

## Transfer of Expense (TOE) online System

- **“High Risk”** transfers (debits to Federal and FFT fund sources) will require:
  - The answering of 4 questions that must be completed for the transfer to be approved
  - Will require additional approval by EMF Accountant
  - The transfer needs to be printed by pressing the “PDF Print” button.
  - The transfer must be signed by the PI, Dept Head/Chair, or Other Academic Official and maintained in the dept for auditing purposes, as well as all the backup documentation relevant to the transfer



# UFIN 120 – Non-Payroll Expenditures Adjustment Request

<https://www.bfs.ucsb.edu/extramural-funds/cost-transfers/transfer-expense-mechanisms>

Manual UFIN (PDF) transfers are acceptable only for the following reasons:

- Transfer is not able to process in the TOE system
- ✓ TOE may think transfer is not within the period of performance but it could be.
- ✓ Mass transfers due to change of fund number.
- ✓ Award is closed/ended and charges still need to be moved.
- ✓ Transfer is over 120 days old, but is going to an unrestricted fund source.
- ✓ <https://www.bfs.ucsb.edu/files/forms/ufin-12011-11.pdf>

# Non-Payroll Expenditures Adjustment Request

(UFIN120:11/11 Revision)

Campus <b>U.C. SANTA BARBARA</b>	Department Name	
Date Prepared	Prepared By	Tel. Ext.

	FROM (Credit)					TO (Debit)					Description of Transaction				Document Date			Amount		GLO60 being Adjusted						
	L	Account	Fund	S	Object	L	Account	Fund	S	Object	Description on GL060	PO or Ref Number	Type Entry	Voucher Number	Mo	Dy	Yr	Amount	Mo	Yr						
	8	9	14	15	19	20	21	24	25	26	31	32	36	37	38	41	42	54	55	61	62	63	68	72	73	80
1																										
2																										
3																										
4																										
5																										
6																										
7																										
8																										
9																										
10																										
																		<b>TOTAL</b>								

- Question #1 below must be answered for all cost transfers.**
1. Explain why the expense was not originally charged to the appropriate fund and why the expense was charged to the account/fund from where it is now being moved.
- Contracts & Grants: Cost Transfers that include contracts and grants must answer in detail the additional questions below to be accepted for consideration for expense transfer(s). Supporting documentation is required and attach to the UFIN.**
2. Describe how the cost benefits the award to which the cost is being transferred to. What makes the expense appropriate to the account now receiving the expense?
  3. How does this cost contribute to achieving the project's objectives?
  4. What action is being taken to eliminate future need for cost transfer of this type?
  5. The cost is over 120 days from the original ledger month end date: Explain in detail the reason for tardiness and how it will be prevented in the future. Review the Escalation Procedure to determine if an Escalation Signature Form is required.

**Department Certification and Approval\*\***  
 I Certify that the above listed adjustments are proper and correct charges and/or credits to the accounts/funds indicated and in accordance with University policy and agreements set forth in the fund sources involved.

	Dept	Approved By	Typed Name	Date	Tel Ext
DEBIT					
CREDIT					
ACCOUNTING OFFICE REVIEW				Retention: Orig./Actg. copy-5 yrs subject to contract & grant requirements Other copies - 0-5 yrs.	

\*\* For adjustments involving contracts and grants, certification and approval signatures must include that of the authorized principal investigator, department chair/head, or other academic official.

# Non-Payroll Transfers (UFIN120)

- UFIN 120 that include contracts/grants must be signed by the principal investigator, chair, or other academic official and in the Signature Authorization System. NOT MSO or Bus Ofcr
- Object Codes must be valid with the sub.
- Document date must be within the period of performance to be valid or explain in detail and provide documentation to determine if the charge is valid.
- Reason - The five questions located on the UFIN 120 must be fully answered for transfers that include contracts & grants. If transfer is not 100%, explain allocation method!
- Tardy Explanation: Attach a memo explaining in detail why the transfer is submitted over 120 days; signed by the principal investigator, chair, or other academic official and in the Signature Authorization System. If Federal, **Escalation Memo** is required. Exception granted only in very rare circumstances for trans. to Fed.



# Payroll Transfers (UCPath)

<https://www.bfs.ucsb.edu/extramural-funds/cost-transfers/transfer-expense-mechanisms>

## ➤ Salary Cost Transfers (SCTs) / Direct Retros that include contracts/grants:

### ➤ Must answer the 4 Questions on the Questionnaire

- Explain how the error occurred and why the transfer is being requested. **If partial transfer, explain the basis for proration and/or split**
- Who approved the transfer of funds? (s/b **Name of PI, Department head/chair**)
- How does the transfer benefit or impact the new funding source being charged?
- Explain the untimeliness if transfer is: > 120 days after original transaction date, and/or > 90 days after the fund end date.


**Print a paper copy for your dept records which must be signed** by the principal investigator, department head / chair, or other academic official. Retain in dept. files for auditors just like you do for TOE online system.

## ➤ Pay period must be within the period of performance of the award.



# Late Cost Transfer Escalation Procedure for Contracts and Grants

- ✓ Prepare the manual UFIN (non-payroll) or Direct Retro in UCPath (payroll)
- ✓ Follow the “Late Cost Transfer Escalation Procedure” for contract and grant cost transfers over 120 days.
  - <http://www.bfs.ucsb.edu/extramural-funds/non-payroll-cost-transfers/late-cost-transfer-escalation-procedure-contracts-grants>
  - Prepare the Late Cost Transfer Exception Signature Form. **Submit with paper UFIN or as an attachment to your Direct Retro/SCT in UCPath.** Make sure you have signatures from the form preparer, Principal Investigator, & your Department Head/Chair!
  - [https://www.bfs.ucsb.edu/sites/www.bfs.ucsb.edu/files/forms/EMF120DayExceptionForm\\_0.pdf](https://www.bfs.ucsb.edu/sites/www.bfs.ucsb.edu/files/forms/EMF120DayExceptionForm_0.pdf)



## Escalations will not be granted in the following situations:

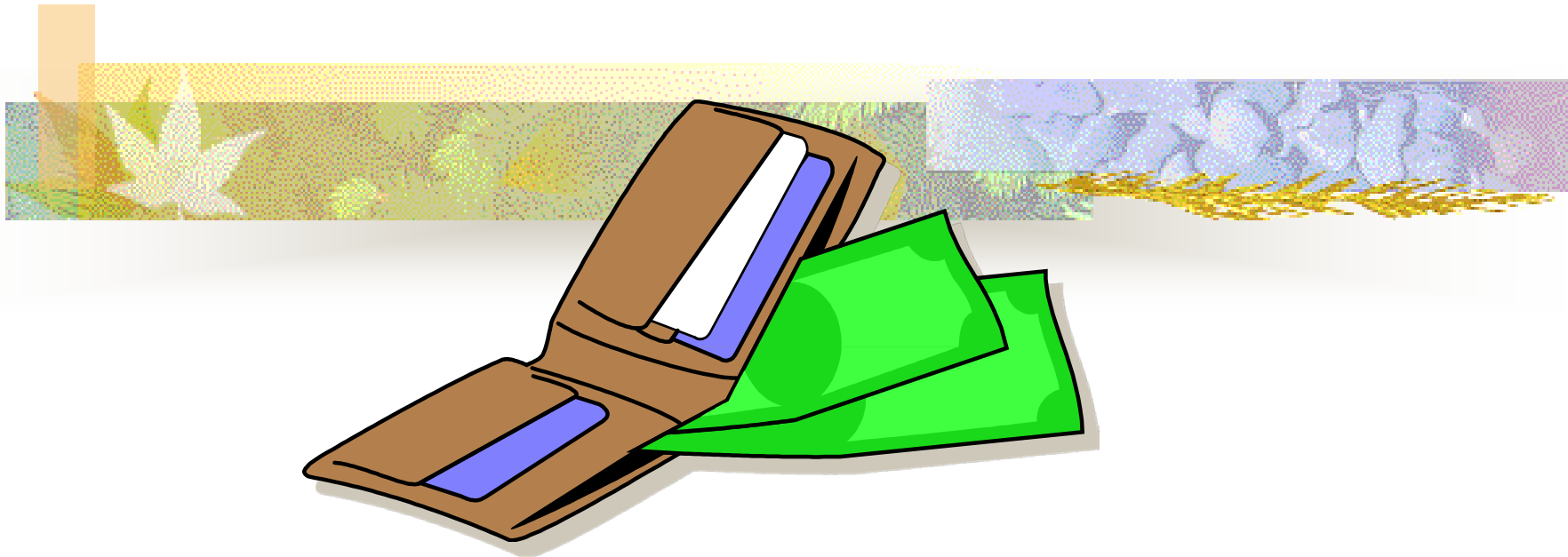
- Failure of staff to prepare cost transfers in a timely manner.
- Failure of Principal Investigators to inform department administration of needed cost transfers.
- A department being short staffed is not a valid reason to grant exception!



Transfers with the following situations do not fall under the escalation requirement (You do not need to complete the Escalation Memo):

- Cost transfers between **Accounts** within the same fund as long as Award # the same.
- Cost transfers correcting **Sub Accounts** within the same fund.
- Cost transfer correcting **Object Codes** within the same fund.
- Transfers from a contract or grant fund to a **non-Federal** fund source.


# VI. Overdrafts/Credit Balances



*OMB Uniform Guidance states: “Any costs allocable to a particular sponsored agreement under the standards provided in this Circular may not be shifted to other sponsored agreements in order to meet deficiencies caused by overruns or other fund considerations, to avoid restrictions imposed by law or by terms of the sponsored agreement, or for other reasons of convenience.*

What is an overdraft?

When expenditures exceed the amount of appropriation (budget).



\$246.78 OD

~~boing~~

~~boing~~

# Transfer of expense (TOE) to clear overdrafts

- ✓ Transfers should remain in research (do not transfer to a 40XXXX instruction account).
- ✓ Transfers must be allowable, allocable, and reasonable.
- ✓ Overdrafts must be transferred before the award closing.
- ✓ One Exception: If you are surely expecting a continuation (more money) coming in, keep charging to award to avoid later cost transfers, even if temporarily in OD.







# Contract & Grant Credit Balances After Award Closes

- **Credit balances** should be cleared as soon as possible. All expenses must be on ledger within 120 days of end date!
- **Publications costs** must be incurred or have a written estimate from vendor within the project period of performance.
- The **balance** of the award should equal to zero within a reasonable amount of time (i.e. 0-120 days after End Date).



# BREAK TIME!

Please come back at the time  
instructor asks you to return.