



**SANTA CLARA UNIVERSITY
SPONSORED PROJECTS OFFICE
EQUIPMENT AND REAL PROPERTY MANAGEMENT POLICY**

Effective Date: August 21, 2026

Last Revision: August 21, 2026

1. Purpose

Santa Clara University (the "University") maintains a system of internal controls to ensure that equipment and real property acquired, improved, or managed with Federal award funds are appropriately identified, used, safeguarded, inventoried, and disposed of consistent with the requirements of **2 CFR 200 (Uniform Guidance)**.

2. Scope

This Equipment and Real Property Management Policy (this "Policy") applies to equipment and real property acquired, improved, or managed in whole or in part with Federal award funds received directly by the University or through a pass-through entity.

3. Policy

The University will manage equipment and real property acquired or improved with Federal award funds in accordance with applicable Federal requirements, the terms and conditions of the Federal award, and University policies and procedures.

Equipment

Consistent with [2 CFR §200.313](#), the University will maintain a property management system that provides for the appropriate identification, use, safeguarding, maintenance, inventory, and disposition of equipment acquired in whole or in part with Federal award funds.

Title to equipment acquired under a Federal award will generally vest in the University upon acquisition, subject to the conditions established in [2 CFR §200.313\(a\)](#) and the terms and conditions of the Federal award. A Federal awarding agency may retain or reserve rights to equipment, including the right to require transfer of title, as provided by Federal

requirements or the award.

Equipment acquired with Federal award funds must be used for the program or project for which it was acquired for as long as it is needed for that purpose, and must be maintained and kept in good condition. Use of such equipment for other federally supported activities will be governed by [2 CFR §200.313\(c\)](#) and applicable award terms.

Consistent with [2 CFR §200.313\(d\)](#), the University will maintain property records sufficient to identify and account for federally funded equipment, including its description, identification / serial number, funding source, ownership, acquisition date and cost, location, use, condition, and disposition, as applicable.

The University will maintain appropriate controls to safeguard federally funded equipment against loss, damage, theft, and unauthorized use, and will appropriately maintain equipment under its control.

A physical inventory of federally funded equipment will be conducted and the results reconciled with University property records **at least once every two years**, as required by [2 CFR §200.313\(d\)\(2\)](#), or more frequently when required by the applicable Federal award or Federal awarding agency. Discrepancies identified through the inventory and reconciliation process will be investigated and resolved in a timely manner.

Equipment subject to Federal requirements may not be sold, transferred, disposed of, encumbered, or otherwise removed from University control except in accordance with [2 CFR §200.313](#), applicable Federal agency requirements, award terms, and University procedures.

Real Property

Consistent with [2 CFR §200.311](#), title to real property acquired or improved under a Federal award will generally vest in the University upon acquisition, subject to applicable Federal requirements and the terms and conditions of the Federal award.

Real property acquired or improved with Federal award funds must be used for its originally authorized purpose for as long as it is needed for that purpose. The University will not dispose of or encumber its title or other interests except as permitted by applicable Federal requirements and award terms.

When real property is no longer needed for its originally authorized purpose, the University will obtain disposition instructions from the Federal awarding agency or pass-through entity when required and will dispose of the property in accordance with [2 CFR §200.311\(d\)](#) and applicable award terms.

4. Definitions

- **Equipment** means tangible personal property, including information technology systems, having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds the lesser of the University's capitalization threshold or the threshold established in [2 CFR §200.1](#).

- **Federal Award** means Federal financial assistance received directly from a Federal awarding agency or indirectly through a pass-through entity, as defined in [2 CFR §200.1](#).
- **Pass-Through Entity (PTE)** means a non-Federal entity that provides a subaward to the University to carry out part of a Federal program.
- **Real Property** means land, including land improvements, structures and appurtenances thereto, and legal interests in land, as defined in [2 CFR §200.1](#). Real property does not include movable machinery and equipment.

5. Responsibilities

Principal Investigators

Principal Investigators are responsible for the appropriate use and stewardship of federally funded equipment associated with their sponsored projects. Principal Investigators are responsible for:

- using federally funded equipment in accordance with applicable Federal requirements and award terms;
- safeguarding equipment under their control;
- participating in required physical inventories;
- reporting changes in the location, condition, custody, or use of equipment; and
- obtaining appropriate University review before equipment is acquired, installed, transferred, sold, disposed of, or otherwise removed from University control.

Custodial Departments and Units

University departments and units having custody of federally funded equipment are responsible for supporting the appropriate identification, safeguarding, maintenance, and physical inventory of equipment under their control and for reporting changes affecting University property records.

Sponsored Projects Office

The Sponsored Projects Office (SPO), under the direction of the Senior Director of Sponsored Projects, is responsible for administering the University's property management process for equipment acquired in whole or in part with Federal award funds. SPO is responsible for:

- identifying equipment subject to Federal property management requirements;
- maintaining the inventory of federally funded equipment;
- coordinating the identification and tagging of federally funded equipment;
- coordinating and documenting the physical inventory and reconciliation of federally funded equipment at least once every two years;
- investigating and resolving discrepancies identified through the inventory and reconciliation process;
- providing guidance and training to Principal Investigators and other University personnel regarding Federal property management requirements;
- reviewing applicable Federal and award requirements related to the use, transfer, and disposition of federally funded property; and

- maintaining documentation sufficient to demonstrate compliance with applicable Federal property management requirements.

SPO will coordinate with other University offices as necessary to support these responsibilities.

6. References

- 2 CFR §200.303, Internal Controls
- 2 CFR §200.311, Real Property
- 2 CFR §200.312, Federally-Owned and Exempt Property
- 2 CFR §200.313, Equipment
- 2 CFR §200.314, Supplies
- 2 CFR §200.316, Property Trust Relationship

Responsible University Office

Office of the Provost and Executive Vice President | Sponsored Projects Office

Location: Walsh Administration | Learning Commons and Technology Library, Suite 331

Email: provost@scu.edu

Phone: 408-554-4533

Exhibit A

Federal Equipment and Real Property Management Procedure

The procedures described in this Exhibit reflect the University's current practices for implementing the Equipment and Real Property Management Policy as of its effective date. These procedures may be revised from time to time to reflect operational needs, changes in University systems or responsibilities, or changes in applicable Federal requirements. Current procedures will be maintained and published by the Sponsored Projects Office on its website.

Changes to these procedures that do not materially alter the requirements of the Equipment and Real Property Management Policy do not require revision of the Policy.

1. Award Acceptance and PI Responsibility

At the time a Federal award is accepted, SPO will review the award to identify applicable requirements related to equipment and real property.

When a Federal award includes the acquisition, improvement, use, or management of equipment or real property subject to Federal requirements, the Principal Investigator will be informed of the University's stewardship obligations.

The Principal Investigator will be informed that these obligations include:

- using federally funded property for authorized purposes and in accordance with applicable Federal requirements and award terms;
- safeguarding and appropriately maintaining equipment;
- notifying the University of changes in the location, custody, condition, or use of equipment;
- participating in required physical inventories; and
- obtaining University review before equipment is acquired, installed, sold, transferred, disposed of, or otherwise removed from University control.

SPO will also identify any award-specific provisions concerning title or ownership of property. Title to equipment acquired under Federal awards will generally vest in the University; however, Federal agencies may retain title, reserve the right to require transfer of title, or impose other property requirements. Applicable award terms and Federal requirements will govern.

2. Acquisition and Identification of Equipment

Equipment acquired in whole or in part with Federal award funds will be identified through the University's purchasing, financial, and property management processes.

SPO will identify equipment subject to Federal property management requirements, assign or coordinate the assignment of an institutional property identification number, and ensure that an appropriate property tag is affixed to the equipment.

The federally funded equipment inventory will identify the sponsored funding source associated with the equipment and contain the information necessary to meet applicable Federal requirements.

If equipment cannot reasonably or safely be physically tagged, the inventory record will document the method used to identify and track the equipment.

Principal Investigators should work with Environment, Health and Safety prior to acquiring equipment that requires specialized safety, utility, or environmental handling.

3. Property Records

SPO will maintain property records for federally funded equipment consistent with **2 CFR §200.313(d)**.

Property records will include, as applicable, sufficient information to identify the equipment, its funding source, ownership, acquisition date and cost, location, use, condition, and disposition.

The property record will be updated when there is a material change affecting an asset, including a change in location, custody, condition, status, or disposition.

Principal Investigators and custodial departments must promptly communicate such changes to SPO.

4. Use and Stewardship

Federally funded equipment must be used for the purpose for which it was acquired for as long as it is needed for that purpose.

Use of federally funded equipment for other activities will be governed by **2 CFR §200.313(c)**, applicable Federal agency requirements, and the terms and conditions of the award.

Principal Investigators and custodial departments are responsible for safeguarding equipment under their control and taking reasonable measures to prevent loss, damage, theft, or unauthorized use.

Loss, theft, damage, destruction, or other material impairment of federally funded equipment must be promptly reported to SPO and other appropriate University offices. SPO will determine whether notification to the Federal awarding agency or pass-through entity is required.

5. Physical Inventory and Reconciliation

SPO will coordinate a physical inventory of federally funded equipment at least once every two years, as required by **2 CFR §200.313(d)(2)**, or more frequently when required by the applicable Federal award or Federal awarding agency.

SPO will establish and maintain the schedule for the biennial inventory. Beginning six months prior to the scheduled completion of the inventory, the Senior Director of Sponsored Projects will periodically report the status of the inventory process to the Associate Provost for Research, including progress toward completion and any significant unresolved issues.

SPO will provide Principal Investigators and custodial departments with the applicable equipment inventory and instructions for completing the physical inventory. Principal Investigators and custodial departments will identify and make equipment available for physical verification and report any known changes in location, custody, use, or condition.

SPO, or another University representative who is not the individual with primary custody of the equipment, will independently verify the physical inventory. For each item subject to inventory, the verification will confirm:

- the physical existence of the equipment;
- the institutional property identification or tag;
- the equipment's location;
- its current use and condition; and
- the accuracy of the corresponding property record.

The results of the physical inventory will be reconciled with the federally funded equipment inventory. Discrepancies, including missing equipment, missing or unreadable property tags, incorrect locations, or incomplete property records, will be investigated and documented. SPO will update the property records as necessary to reflect the results of the reconciliation.

Upon completion of the biennial inventory and reconciliation, the Senior Director of Sponsored Projects will document completion and provide the Associate Provost for Research with confirmation of completion and a summary of any significant discrepancies or unresolved items.

SPO will maintain documentation of the physical inventory, reconciliation, corrective actions, and management review in accordance with applicable Federal and University record-retention requirements.

6. Award Closeout and Continuing Property Obligations

As part of Federal award closeout, SPO will review federally funded equipment and real property associated with the award to determine whether continuing Federal or award-specific property requirements apply.

The end of the Federal award does not, by itself, eliminate applicable requirements concerning the use, management, title, transfer, or disposition of federally funded property.

SPO will communicate continuing requirements to the Principal Investigator, custodial department, and other appropriate University offices.

7. Transfer and Disposition

Federally funded equipment or real property may not be sold, transferred, traded in, donated, discarded, cannibalized, or otherwise disposed of without prior review and authorization by SPO. Before authorizing disposition, SPO will:

- identify the source of funding and applicable Federal award;
- determine the University's title or other ownership interest in the property;

- review applicable award terms and Federal requirements;
- determine whether Federal agency or pass-through entity approval or disposition instructions are required;
- obtain required approvals or instructions before disposition occurs; and
- coordinate with other University offices as necessary (including Environment, Health and Safety for equipment with hazardous materials or physical hazards) to complete the authorized disposition.

Disposition will be completed in accordance with **2 CFR §§200.311** and **200.313**, as applicable, and the terms and conditions of the Federal award.

SPO will ensure that the federally funded property record is updated to document the disposition, including applicable approvals and disposition information.

8. Records and Documentation

SPO will maintain documentation supporting the identification, tagging, inventory, reconciliation, transfer, and disposition of federally funded property in accordance with applicable Federal and University record-retention requirements.

Records will be maintained sufficient to demonstrate compliance with applicable Federal property management requirements.