WELCOME
Agenda

• Procurement Services Update
• Subaward & Consulting Agreement requisitioning
• Subrecipient Monitoring Overview
• Pre-Award Updates
  – IPR Form
  – Grants.gov Workspace
  – Consortium Form
  – Deadline Dates
  – Portfolio Changes
• Post-Award Updates
  – Staffing and Dept Assignments
  – Ongoing Project Statuses
  – Fiscal 17 Year-End
  – Summer Accrual Reversals
  – NIH Prior Approval – 2nd NCE
• Adjourn
Procurement Services Updates
Subaward Updates

• Closing Purchase Orders with Zero Balance Report
  – Emails sent requesting PO’s to be closed on 6/15
  – Report contained false balances, please check each PO carefully before closing

• Requisition Input – Overview of Common Errors

• Subrecipient Monitoring
  – Overview of the Process
  – Advanced Billing on Cost Reimbursement Awards
Requisition Input

- Receiving Required should not be checked
- Payment Request Positive Approval Required should be checked for all subawards
Requisition Input
Requisition Input
Subrecipient Monitoring

Uniform Guidance 2 CFR PART §200.330 Subrecipient and Contractor Determinations

• To determine the relationship of the subrecipient to the pass-through entity, the UG has provided specific language found in 2 CFR Part §200.330.
• Currently, the subaward specialist has a form that is filled out for each subaward but in the future, this will be done in pre-award.
• The language that is used to determine the relationship is detailed on the next slide.
Subrecipient vs Contractor Determination

SUBRECIPIENT – An entity that will carry out part of an award received by the university.
☐ Carries out a portion of the award (e.g. conducts research)
☐ Will have performance measured in relation to meeting objectives of the program
☐ Will be responsible for programmatic decision making and adhering to applicable Federal program requirements specified in the Federal award; and,
☐ In accordance with its agreement, uses the federal funds to carry out a program for a public purpose specified in the authorizing stature, as opposed to providing goods or services for the benefit of the pass-through entity.

CONTRACTOR/VENDOR - An entity from which the university will purchase goods or services for its own use in carrying out the award.
☐ Provides similar goods or services to many different purchasers within normal business operations
☐ Normally operates in a competitive environment
☐ Provides goods or services that are ancillary to the project (supports the primary activity)
☐ Is not subject to compliance requirements of the federal program as a result of the agreement (e.g., IRB Human subject or IACUC Animal protocol congruence and approvals and/or FCOI), through similar requirements may apply for other reasons.

FINAL DETERMINATION: Judgement must be used in determining whether an entity is a subrecipient or contractor. The substance of the relationship is more important than the form of the agreement.
Subrecipient Monitoring

Uniform Guidance 2 CFR PART §200.331 Requirements for Pass-through Entities
This section details all of the requirements that UConn must address when issuing subawards. Items in this section include subrecipient monitoring and all of the information that must be collected and verified before a subaward can be processed. Based on the information collected, additional terms and conditions may need to be added to agreements. The items that will be discussed today in the following slides are:

Annual Single Audit Verification and Management Decision Responses
• Audits reviewed annually for findings that may affect the risk to UConn

Risk Evaluation and Quality Control After-the-Fact Review
• 2 CFR PART §200.331(b) states that all pass through entities must evaluate each subrecipient’s risk of noncompliance with federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring. Compliance with this section of the UG is performed by completing a risk assessment for each subrecipient.
Risk Evaluation

- Three risk levels – Low Risk, Low with Risk Level Actions Assigned, High Risk
- All Low with Risk Level Actions Assigned and High Risk subrecipients are monitored not less than one time per year.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Low Risk</th>
<th>High Risk</th>
<th>Possible Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verify institution &amp; subaward investigator is not debarred/suspended</td>
<td>☐ Not Debarred/Suspended</td>
<td>☐ Debarred/Suspended</td>
<td>G</td>
</tr>
<tr>
<td>Foreign or Domestic</td>
<td>☐ Domestic</td>
<td>☐ Foreign</td>
<td>A, B, C, D</td>
</tr>
<tr>
<td>Organization Type</td>
<td>☐ Select Org Type</td>
<td>☐ Start-Up</td>
<td>F</td>
</tr>
<tr>
<td>Subject to Single Audit (if finding, add to comment section below)</td>
<td>☐ Yes</td>
<td>☐ No</td>
<td>A, B, C, D</td>
</tr>
<tr>
<td>Subrecipient receives awards directly from a Federal awarding agency</td>
<td>☐ Yes</td>
<td>☐ No</td>
<td>A, B, C, D</td>
</tr>
<tr>
<td>Prior experience working with UConn?</td>
<td>☐ Previous positive experience (project completed, no compliance issues)</td>
<td>☐ New subrecipient or previous negative experience</td>
<td>D, F</td>
</tr>
<tr>
<td>PI has indicated the prime award objective is contingent upon the success of the subaward</td>
<td>☐ No</td>
<td>☐ Yes</td>
<td>F</td>
</tr>
<tr>
<td>Payment Type</td>
<td>☐ Cost Reimbursement</td>
<td>☐ Advance Payment</td>
<td>D, E</td>
</tr>
<tr>
<td>Cost Sharing Obligation</td>
<td>☐ No Cost Sharing</td>
<td>☐ Cost Sharing</td>
<td>D</td>
</tr>
<tr>
<td>Percentage of UConn Award</td>
<td>☐ Total cost is &lt;48.8%</td>
<td>☐ Total cost is &gt;48%</td>
<td>I</td>
</tr>
<tr>
<td>Verify Active SAM.gov Registration</td>
<td>☐ Yes</td>
<td>☐ No</td>
<td>H</td>
</tr>
<tr>
<td>Amount of Subaward</td>
<td>☐ Total cost is &lt;$99,999</td>
<td>☐ Total cost is &gt;$500,000</td>
<td>I</td>
</tr>
<tr>
<td>ITAR/EAR Type of Work</td>
<td>☐ No</td>
<td>☐ Yes</td>
<td>J</td>
</tr>
<tr>
<td>IACUC/IRB Compliance</td>
<td>☐ No</td>
<td>☐ Yes</td>
<td>K</td>
</tr>
<tr>
<td>COI Policy</td>
<td>☐ Subrecipient has own policy</td>
<td>☐ UConn policy used by subrecipient</td>
<td>L</td>
</tr>
</tbody>
</table>

Risk Level Actions that may be incorporated in terms and conditions

A. UConn may require system generated general ledger financial reports be included with each invoice.
B. UConn may require transactional ledger of all charges posting to award during invoice period.
C. UConn may require supporting documentation for expenditures included on invoices (e.g., vendor invoices, payroll reports, POs, etc.).
D. Arrange limited scope desk audit of selected invoices.
E. Change from cost reimbursement to fixed price payments based on milestones/deliverables.
F. May recommend terms and conditions for regular communications and/or scheduled reporting deliverables between the UConn PI and the Subrecipient PI (e.g., monthly, quarterly, etc.).

Internal Review and Escalation

G. Do not issue subaward.
H. If SAM.gov registration is not active, UConn notify institution that their Subaward is suspended until SAM.gov registration is reactivated.
I. Subawards >=49% requires SPS Director’s sign off prior to initiating Subaward (sign checklist).
J. Forward award to Export Control Officer.
K. Require subrecipient to forward confirmation of IACUC/IRB protocols prior to initiating subaward.
L. Ensure that COI office is aware and has notified subaward site of reporting responsibilities.
Quality Control After-the-Fact Review

- All Low with Risk Level Actions Assigned and High Risk subrecipients are monitored not less than one time per year.
- Information appropriate to the risk level action assigned is requested from the subrecipient.
- Review budget vs actuals:
  - to ensure categories of invoiced items are appropriate to the general budget categories
  - for expenditure appropriateness
  - For accurate F&A calculations
- Approve or take appropriate action
Quality Control After-the-Fact Review

Advanced billing on cost reimbursement agreements
- Must be determined before the agreement is finalized
- May require sponsor approval
- If you see an invoice that is for an advance payment, don’t approve it.
  - Email subawards@uconn.edu with the edoc number
Pre-Award Updates
Pre-Award

• IPR Form
  – Finalized and will be available for use in July. SPS will continue to accept both the old and new versions through August 31st. The new form must be used for all items submitted to Pre-Award September 1st and later.
  – Same look and feel!
  – Significant Changes
    • Self populating deadline information in the header
    • Location of some fields has changed
    • Some fields specific to Uconn Health only
    • Few new fields (new space/facilities, F&A rate, etc)
Pre-Award

• **Grants.gov Workspace**
  – Timeline
    • **January 1, 2018:** Grants.gov pdf applications no longer available for download
    • **April 1, 2018:** Grants.gov pdf applications no longer accepted
  – Summer Pilot

• **Consortium Form**
  – NIH modular form retired (no longer available on website)
  – Make sure you use the most up to date form
Pre-Award

• **Deadline Dates**
  – Provide the *sponsor* deadline, requests for earlier submissions are requests only
  – New: default deadline for incoming subawards will be the midway point between when the documents are received in Pre-Award and lead/originating sponsor deadline
    • Application received in Pre-Award Monday morning for a sponsor deadline of Thursday will be returned no later than Tuesday

• **Work management while short staffed**
  – Working as quickly as we can, we appreciate your patience!
  – The better prepared your documents are, the faster we can work!
Pre-Award

• **Portfolio Changes**
  – Effective *July 1st* there are new Pre-Award portfolio assignments
  – *All* departments now have an assigned specialist
  – Some assignments are temporary until the new specialist is hired and trained
  – Portfolios will be updated on the website this week
Post-Award Updates
Post-Award

- Update on Staff and Assignments
- Effort Validation Project
- Sponsored Closeout Project
  - Period 13 posting (Delay in closing accounts until August hard close)
- Reminder: Summer Accrual Reversals
Post-Award

• NIH 2\textsuperscript{nd} NCE Prior Approval NCE requirements
  – Can only be submitted by SO via eRA Commons
  – Submission must include/answer:
    • Unobligated Balance of Award Amount
    • Does PI Maintain Measureable Effort?
    • Progress Report (no standardized format)
    • Budget
    • Justification of work to be completed
  – Does not apply to fellowship grants
  – NIH [YouTube video](https://www.youtube.com)
Adjourn

• Questions?

• Enjoy your summer!