Sponsored Programs Administration

May 28, 2019
Agenda

- Welcome
- CRA Study Group Update
- UCH Compliance Group
- Year End Processes
- 7630 Account Category
- Fringe Benefit Rates
- Salary Cap Updates
CRA Study Group Update

**Fall 2019 Exam Dates – November 2-16, 2019**

- Weekly study groups will meet beginning the week of August 26
- Will meet for 11 weeks using the Virginia Tech Study Guide (VTSG)
- We have only one sign in for the VTSG so please email me if you would like access
- Using the VTSG program is not enough to pass the exam so the group will self-study the VTSG then meet weekly to engage in practice activities, discussion, and support

*Information regarding the fall study sessions will be sent via email during the first week of August.*
Who We Are:

OFFICE OF UNIVERSITY COMPLIANCE

President

Joint Audit and Compliance Committee

Kimberly Fearney
Associate Vice President & Chief Compliance Officer

Liz Vitullo
Executive Assistant

Omar Andujar
Associate Compliance Officer

Bruce Gelston
Associate Compliance Officer

Kim Hill
Associate Compliance Officer – UCH

INDIVIDUAL RESPONSIBILITY • INSTITUTIONAL SUCCESS
What We Do:
The Office of University Compliance promotes a University-wide culture of compliance and ethics and supports the University’s commitment to the value of integrity.

How We Do It:
- Operationalize the institution-wide compliance and ethics program
- Promote the University’s commitment to compliance & ethics
- Provide guidance through the role of the Ethics Liaison
- Monitor compliance areas and assist with addressing control vulnerabilities through collaboration with content-experts
- Manage the anonymous REPORTLINE, respond to concerns and investigate alleged violations
- Develop and facilitate University-wide annual compliance training
- Develop and disseminate educational tools and training opportunities regarding compliance-related matters
- Oversee and manage the Compliance Committee
- Support University-wide compliance initiatives
- Provide updates to the Joint Audit and Compliance Committee (JACC)
OFFICE OF UNIVERSITY COMPLIANCE

Why We Do It:

To meet our individual and collective COMMITMENTS

To ENHANCE consistency in practical application of values, processes, procedures, and accountability

To increase TRANSPARENCY and DECREASE institutional vulnerabilities

To build TRUST in systems and structures
Meet Dr. P:

Dr. P holds multiple roles at UConn Health – she is a faculty member, a clinician, and a researcher.

Dr. P has been at UConn Health for three years and has yet to be a PI on a project; however is sub-awardee on a current project funded by the NIH.

University Compliance receives an anonymous report regarding Dr. P that alleges:

1. Dr. P has a faculty affiliated company (FAC) that is connected to research she is engaged in.
2. Dr. P is using some of the NIH funds for prohibited use.
3. Dr. P has verbally shared her company is situated in China.
What might University Compliance Do with Dr. P?

- Engage and collaborate with content-area experts to gather information and understand the circumstances – What do we know and what do we need to know?

- Identify potential policies, laws, and regulations that may be impacted – Is there a potential Compliance concern?

- Facilitate cross-functional dialogue to identify an appropriate plan of action – Who is best situated to assist in reviewing and identifying potential solutions?
OFFICE OF UNIVERSITY COMPLIANCE

Building a Partnership:

Shared commitment to supporting faculty with compliance to expand opportunities

Collaborating on education and outreach for shared success

Promoting and contributing to solution-focused thinking and actions

Leveraging each others expertise for the greater good of the employees and for the institution

INDIVIDUAL RESPONSIBILITY • INSTITUTIONAL SUCCESS
Keep the Conversation Going:

Contact us, anytime, regarding compliance-related concerns. Visit our website at www.compliance.uconn.edu for educational tools and resources including videos, informative handouts, and podcasts.

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Year End LDCA Processing

For reporting and budgeting purposes it is required that all fy19 payroll changes affecting the allocation of ledgers 1, 2, cost-share or unfunded research funds must be processed by Thursday June 20, 2019.

Effort reports will not be available before the 6/20/19 processing date.

- **This does not mean you can’t review your effort!** Reports in AMS allow you to review effort on grants within your department.

Please meet with your PIs to discuss any unplanned changes in effort of which you aren’t aware!
Reminder: The AMS system will lock you out at the end of the day on 6/18/19 just like any other payroll week.

Any LDCAs put into the system will need to be fully approved by SPS, the Deans, PIs, and Accounting in order for them to be processed on 6/20/19.

Do not wait until the last week to put them in!!
What happens if you need to change effort on a grant after 6/20/19? (Note: you still need to follow the terms of the grant such as committed effort)

- Your offset **MUST BE** to another Ledger 3, 4, 5 or 6 fund. Only LDCAs that change non-fiscal funds can be processed.
- If you need to decrease effort on a grant:
  - The increase CANNOT be to a fiscal fund (Ledger 1, 2, cost share, or unfunded research).
  - **If the corresponding increase does not properly belong on a different grant, you will need to use a DCAA, residual or ledger 3 fund to offset.**
- If you need to increase effort on a grant:
  - The decrease cannot be to a fiscal fund (Ledger 1, 2, cost share, or unfunded research).
  - You can decrease any Ledger 3-6 accounts.

**If you have no Ledger 3-6 accounts to decrease you might not be able to increase the effort on a grant!**
Banner 7630 Pool

- Utilized to account for articles of tangible nonexpendable personal property having a useful life of more than one year and an acquisition cost between $1,000 and $5,000 per unit.

- Formerly classified as capital assets, these are now considered supplies, and are categorized as such by the institution (e.g., no longer capitalized and depreciated).

- Controlled assets are tagged by the Office of Logistics Management (OLM) with green tags. These items have a purchase price less than $5,000.00 per unit and have one of the following characteristics:
  - Are prone to theft; or
  - May contain HIPAA or FERPA sensitive information (iPads, cameras, computers, etc.); or
  - Have a fair market value (FMV) higher than their purchased price.
ISSUE: Banner hierarchy required a re-budget into the “7630 – “Other Expense – Equipment” account pool.

- Additional administrative work;
- Delays in purchasing;
- Orphaned budget balances in the pool.

RESOLUTION: For Sponsored Project Purchases, SPS has established new accounts that “pool” directly to 7450 Supply:

- 75520: Grants Equipment LT $5,000
- 75521: Grants Computers LT $5,000
- 75522: Grants Purchased Software LT $5,000
7630: Equipment – Revised Procedure

IMPLEMENTATION:

• No change is necessary for projects that are currently budgeted with 7630: “Other Expense – Equipment.”

• Responsibility for the allowability of the purchase will rest with department administrators.

• Ensure that proper procurement methods are followed; utilize the appropriate account code.

• Contact Sponsored Program Services with any questions.
Effective July 1, 2019, the current and new allocation of recovered F&A dollars are as follows:

<table>
<thead>
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<th>F&amp;A Allocation</th>
<th>Dean Allocation</th>
<th>Dept Allocation</th>
<th>PI Allocation</th>
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<tr>
<td>Current</td>
<td>4%</td>
<td>7%</td>
<td>5%</td>
</tr>
<tr>
<td>New, eff 7/1/19</td>
<td>7%</td>
<td>7%</td>
<td>7%</td>
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Our fringe benefit rate proposal for FY 2020 has been submitted to DHHS. The proposed rates are shown in the table below.

(Note that the classified rate is currently capped at 79.0%)

The highlighted rates shown above are the anticipated rates for fiscal year 2020. Due to the fact that most applications include budgets for future periods, as many as five years in advance, Sponsored Program Services recommends that the Rates for Proposed Budgeting (indicated below) be used for most grant proposal submissions. These rates include an increase to cover anticipated changes and increases in future years. Exceptions to this are proposals to State and other agencies where the majority of the project will take place during fiscal year 2020 (07/01/2019-06/30/2020). For those proposals the FY20 proposed rates shown above should be used.

(Note that the classified rate is currently capped at 79.0%)
The DHHS Salary cap is being raised to $192,300 effective as of January 6, 2019.

Use this amount as the starting point for any applications that you prepare to DHHS agencies (specifically, NIH, SAMHSA, HRSA, AHRQ, CMS, FDA, ACL, ACF, ATSDR and the CDC) for those individuals whose annual salary exceeds this amount and who will be working on and charged to the grant.

For existing awards that are currently in place, the new salary cap will be charged effective March 15th, 2019. Retroactive adjustments before that date will not be made.

The link to the announcement is below. We will update our website with this information in the coming days.

Please note that this cap does not apply to NSF, DoE or DoD awards.


Next SPA and Questions

Have a question or topic you would like covered at the SPA Meetings? Email brenda.lowther@uchc.edu

Next Meeting:

June 2019

Date to be Determined