Agenda

- Welcome
- Look for Jonathan!
- Training Update
- New Website
- Review of new ICF
- Procurement and Sole Sourcing
- Process for Contracts and Subawards
- Effort Reporting
- New F&A Agreement
- Sponsor Updates
  - NSF, NIH, and DOD
Look For Jonathan!

This slide does not count!

- Jonathan is hidden in the slides
- Can be in any form
- First to find him wins a prize!
- I will not remind you after today
- He will get harder to find as the year goes on
• Program Overview
• What's happening behind the scenes
Training Updates

Program Overview

• Met with many administrators on this campus
• Researching and working with other institutions to see what is being done, what is available, and to get ideas for our program
• Learned the basics to produce quality videos/training modules
  • Adobe Creative Cloud suite of products for creating, editing, animating, and finishing videos
  • Recording studio on the Storrs campus
  • SharePoint site development
• Have two videos in production that will be out soon
• Finalizing priorities to start full-scale production
• Always looking for recommendations. Please contact me with any suggestions, questions, or comments!
Website Update

- New Look
- Cross Campus Info
- Training Info

Brenda Lowther
New Form

- Changes to the Information and Compliance Form

Brenda Lowther
• The FDP Expanded Clearinghouse is an initiative to use on-line entity profiles in lieu of subrecipient commitment forms to obtain required information.

• FDP members have agreed to only request subaward-specific information from “Participating Organizations” and seek general institutional information (address, DUNS, EIN, etc) from the FDP website: https://fdpclearinghouse.org/organizations

• The Information and Compliance Form for Subrecipients was updated to include a FDP Expanded Clearinghouse section.

• UConn Health is not a “Participating Organization” of the FDP, but is seeking to become a member. This means that when UConn Health is the subawardee, the Passthrough Entity (PTE) will NOT be able to obtain our institutional information from the FDP Clearinghouse website.

• Note that UConn is a member of FDP so we will need to be sure that PTEs are clear that we are a separate entity.
Subrecipients who participate in the FDP Expanded Clearinghouse can now skip to the Subrecipient Certification section after completing the first page of the form.

- Participating subrecipient institutions should be verified at: https://fdpclearinghouse.org/organizations

The previous form will be accepted for proposals received on or before December 31st.

The updated form will be required for proposals received on or after January 2, 2019.
Same Information/Different Format

• To participate in the FDP Clearinghouse, we agree to reduce the administrative burden to other participants
• The new setup means everyone fills out page one
• Page one is project-specific

• New question regarding FDP participation
Only Non-FDP Members fill out the top of page 2

The top of page 2 is institution-specific

Everyone must sign the Subrecipient Certification
Sole Sourcing Discussion

Paul Hudobenko

ovpr.uconn.edu | ovpr.uchc.edu
Uniform Guidance Procurement Update

UNIFORM GUIDANCE MAY REQUIRE EQUIPMENT COMPETITIVE BIDDING PROCESS AT TIME OF AWARD

• One of the recent changes in Uniform Guidance involving procurement is increased scrutiny for sole source justifications.

• This may effect awards such as the NIH S10 equipment grants. Previously it was thought that when submitting equipment grant applications, if a vendor quote for the piece of equipment was provided in the application and then awarded, the NOA and quote are considered the “approval” as the Sole Source justification.
UNIFORM GUIDANCE MAY REQUIRE EQUIPMENT COMPETITIVE BIDDING PROCESS AT TIME OF AWARD

- After the institution enquired to NIH about recent equipment awards, NIH responded that procurement must seek competitive bidding for the equipment.
- For the time being, at time of application, the institutional SOP will remain unchanged. This information is to give faculty and departments a heads up that at time of award, procurement may need to seek competitive bidding.
• Process to be followed for the next six months
As many of you know, Jen Pomales will be on maternity leave until April 18, 2019. Please use the contacts below during this time.

- Sunita Singh, Christine Kaminski, and Brenda Lowther will be covering outgoing Subawards.
- Cherron Payne will be responsible for incoming contracts and research agreements. (only those agreements that Jen Pomales handled)

Please continue to submit all agreements in the same manner that you have been: to the SPS mailbox with an IPAS, discussing with your project officer, etc. Contact Paul Hudobenko with any questions.
WISE WORDS FROM BEN:

“TO BE A COST TRANSFER YOU MUST FIRST BE A COST.”
Cost Transfers

UNIFORM GUIDANCE: 2CFR 200 SUBPART E – Cost Principles

• Be necessary and reasonable for the performance of the Federal award and be allocable under these principles;

• Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items;

• Be consistent with policies and procedures that apply uniformly to both federal and non-federal activities of the University;

• Be accorded consistent treatment;

• Be determined in accordance with generally accepted accounting principles (GAAP);

• Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period;

• Be adequately documented.
NIH GRANTS POLICY STATEMENT:

Cost transfers to NIH grants that represent corrections of clerical or bookkeeping errors should be accomplished within 90 days of when the error was discovered. The transfers must be supported by documentation that fully explains how the error occurred and a certification of the correctness of the new charge by a responsible organizational official...

An explanation merely stating that the transfer was made "to correct error" or "to transfer to correct project" is not sufficient. Transfers of costs from one project to another or from one competitive segment to the next solely to cover cost overruns are not allowable.
§200.303 Internal Controls

The non-Federal entity must:

• Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.

• Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
Cost Transfers

UCONN POLICY

• Bridges the gap between UG and most Federal Grant Policy Statements:
  • Must be supported by documentation that contains an explanation of how the error occurred and a certification as to the correctness of the charge;
  • Explanation should contain a description of the expenses being transferred including why the original charge occurred;
  • Why it is appropriate to charge the receiving account and how the expense is allocable to the new grant;
  • An explanation merely stating the transfer was made “to correct an error” is not sufficient.
UCONN POLICY, cont.

• Cost transfers are to be prepared and submitted within 90 days from the end of the calendar month in which the transaction appears on the university’s month-end accounting statements;

• Cost transfers to correct an error must be completed regardless of timeframe when the correction is to the benefit of the sponsor.
Cost Transfers

WHY ARE THEY PROBLEMATIC?

A cost that has been charged to an account has already been certified for allowability, allocability, and as being a direct benefit to a project:

A COST TRANSFER INVALIDATES THAT ORIGINAL CERTIFICATION!!
 WHICH COST TRANSFERS ARE PROBEMATIC?

• Transfers between two Federal projects (deficits cannot be cleared from one project to another);
• Transfers to Federal projects occurring more than 90 days after the original transaction;
• Transfers to Federal projects at the end of the project period;
• Inadequate explanation or justification for the transfer.

WHAT DOES THIS TRANSFER SAY ABOUT OUR INTERNAL CONTROLS??
Cost Transfers

FINAL THOUGHTS

• Part of the system of internal control must include a review of month end financial reports by the principal investigator and department administrator.

• But dave, you said the explanation can’t be “to correct an error…”

• What is not a cost transfer?

PRE-AWARD COSTS; COST OVERRUNS; TRANSFERS BETWEEN TASKS OF AN AWARD; SERVICE CENTER CHARGES ORIGINALLY CHARGED TO A NON-SPONSORED FUND.
• New On and Off Campus Rates

Paul Hudobenko
New “OFF CAMPUS” Definition

Retired Definition

(4) For all activities performed in facilities not owned by the institution and to which rent is directly allocated to the project(s), the off-campus rate will apply. Actual costs will be apportioned between on-campus and off-campus components. Each portion will bear the appropriate rate.

Definition Effective July 1, 2018

Effective 7/1/2018:
OFF-CAMPUS DEFINITION: For all activities performed in facilities not owned by the institution and to which rent is directly allocated to the project(s) the off-campus rate will apply. Grants or contracts will not be subject to more than one F&A cost rate. If more than 50% of a project is performed off-campus, the off-campus rate will apply to the entire project.
Sponsor Updates

- NSF
- NIH
- DOD

Paul Hudebenko
PRE-applications submitted through eBRAP should include your **SPS project officer** as the “Business Official”, **NOT** Paul Hudobenko. The Business Official listed in the pre-application is the same person listed in Box 5 of the full application as the “person to be contacted on matters involving the application”.

This data, in addition to other specific information (i.e., title, eBRAP log #, etc.), must be identical between the pre-application and the full-application for eBRAP to process an application.
NIH Updates

Research Performance Progress Reports (RPPR) changes:

• NIH has modified the RPPR to incorporate the same delegation options to institutions for I-RPPR and F-RPPR’s.

• NIH changed its RPPR format to allow effort reported in grant applications to include decimals.
  • Example: PD/PI contributes 20% effort, RPPR now allows for reporting 2.4 calendar months rather than rounding effort down to 2 calendar months.

Read the Entire Notice at NOT-OD-18-202
NIH has recently posted videos to assist with putting together a successful proposal. Quickly learn how to access application forms, ensure your application is a good fit for an announcement, and make an important final check of your application after submitting with new videos from the Office of Extramural Research (OER).

Videos are available on the How to Apply - Video Tutorials page to help you avoid common mistakes and position yourself for success:

- Tip: Accessing application forms
- Tip: Check for fit, before you submit!
- Tip: If you can't view it, we can't review it!
NSF Update

For NSF Awards and Investigators:

• NSF is in the process of performing audits.
• Many are currently underway.
• In particular, they are using data analytics to pull information for the audit.
Have a question or topic you would like covered at the SPA Meetings? Email brenda.lowther@uchc.edu

Next Meeting:

November 27, 2018
11:00 a.m.
ARB Large Conference Room
(room subject to change)
# Upcoming SPA Dates

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>November 27, 2018</td>
<td>11:00 am - 12:00 pm</td>
<td>ARB Large Conference Room</td>
</tr>
<tr>
<td>January 15, 2019</td>
<td>11:00 am - 12:00 pm</td>
<td>ARB Large Conference Room</td>
</tr>
<tr>
<td>February 19, 2019</td>
<td>11:00 am - 12:00 pm</td>
<td>ARB Large Conference Room</td>
</tr>
<tr>
<td>March 19, 2019</td>
<td>11:00 am - 12:00 pm</td>
<td>ARB Large Conference Room</td>
</tr>
<tr>
<td>April 16, 2019</td>
<td>11:00 am - 12:00 pm</td>
<td>ARB Large Conference Room</td>
</tr>
<tr>
<td>May 14, 2019</td>
<td>11:00 am - 12:00 pm</td>
<td>TBD</td>
</tr>
<tr>
<td>June 18, 2019</td>
<td>11:00 am - 12:00 pm</td>
<td>TBD</td>
</tr>
</tbody>
</table>