Sponsored Programs Administrators Meeting

April 21, 2021
• Joni Gould Retirement
• Consultants & Contractors on Sponsored Awards – Kathleen Kearney
• Salary Cap
• American Heart Association Carryover and No Cost Extension Updates and Reminders
• Publications and Printing Costs on Sponsored Awards
• IPR Routing Tips
• eRA Commons Phasing Out Internet Explorer
• Redesigned RePORT Tool
• eRA Commons Login Tip
• NIH Biographical Sketch and Other Support
Joni Gould, Sponsored Program Services Team Lead & Assistant Director, will be retiring effective April 30, 2021 after more than 34 years of service with the State of Connecticut and University.

Please join us in wishing her well!

Thursday, April 29th
11:00am-12:00pm

s.uconn.edu/goodbyejoni

• Please contact laurie.pudlo@uconn.edu or dana.wine@uconn.edu for more information.
**Contractor/Consultant vs Subrecipient**

**Contractor** – Per §200.22 a contract means a legal instrument by which a non-Federal entity purchases property or services needed (i.e. like a vendor) to carry out the project or program under a Federal award. In general, the contractor relationship with UConn will include the following characteristics (per §200.330):

- Provides the goods and services within normal business operations
- Provides similar goods or services to many different purchasers
- Normally operates in a competitive environment
- Provides goods or services that are ancillary to the operation of the Federal program
- Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons

**Subrecipients** – Per §200.93 a subrecipient is a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency. In general, a subrecipient relationship with UConn will include the following characteristics (per §200.330):

- Has its performance measured in relation to whether objectives of a Federal program were met
- Has responsibility for programmatic decision making
- Is responsible for adherence to applicable Federal program requirements specified in the Federal award
- In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity
Consultant:
• provides professional or technical expertise and is not employed by the UConn
• evaluates the client's needs and provides expert advice and opinions
• end result usually a recommended course of action

Consultant Agreement: will have Scope of Work (SOW), but may not have tangible deliverables other than a document/report at end of service
Commodity Code: 133 for grant-funded services
132 for non-grant funded services

Contractor (Professional Services):
• provides professional or technical expertise and is not employed by the UConn
• evaluates the client's needs, may provide advice & opinions
• performs the work (often there are tangible deliverables)

Examples: hosting and organizing meetings, data collection/analysis, IT development, survey or marketing services, editing or graphic services, translation services.

Service Agreement: Often has Scope of Work (SOW) with defined deliverables
Commodity code: review UCONN’s commodity code list for specific assignment (https://purchasing.ubs.uconn.edu/resources/)
Professional Services: commodity code default is #306 if a specific CC# is unavailable
What do other Universities say about sourcing Consultants

**NSF / NIH direction regarding “named in grant”:** expectation is a sourcing process was conducted before identifying specific goods/services named in the grant proposal

**Other University’s Directives regarding Consultants paid via Grant Funds:**

- **UC Davis:** Contact several potential consultants with expertise in the particular area you require before agreeing to accept a proposal for work. Search the internet, and/or network with other UC departments or other business contacts for referrals.

- **OSU:** recommends the PI obtain multiple quotes for all individual consultant requests whenever possible in order to streamline processing & support the required cost analysis/justification.

- **So Carolina:** there must be evidence that a selection process has been employed to secure the most qualified person available and that the selection has been approved by a senior office of the University.

- **U Oregon:** .....that by naming the proposed Consultant(s) and/or Vendor(s) in the proposal alone is not sufficient justification for processing a procurement contract through Purchasing and Contracting Services.* At the proposal stage, where Consultants and/or Vendors are named in the proposal (in the proposal budget, budget justification, or elsewhere in the proposal), UO PIs and departments are strongly encouraged to collect and submit to their Pre-Award Sponsored Projects Administrator, three quotes for purchases over $10,000.
## When is Competitive Sourcing Required

Competitive sourcing is **not required** for purchases using Univ, State or Consortia contracted suppliers.

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<th>Threshold</th>
<th><strong>FEDERAL &amp; PRIVATE FUNDING</strong> (Private Funding under “Cutting The Red Tape”)</th>
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<tr>
<td>&lt; $2500</td>
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<td></td>
<td>• Automatic Purchase Order (APO)</td>
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The selected consultant/contractor should provide a formal quote including Scope of Work. Back up quotes may include formal quotation; email from consultant/contractor detailing services, costs and other conditions of sale; catalog or publicly available prices/rate sheets for the services to be provided. Refer consultants/contractors to UConn Terms & Conditions when preparing quotes. Any amendment to terms may require Contracting, OGC & State AG office review prior to PO approval. https://contracting.ubs.uconn.edu/terms-and-conditions/
Sole Source

Sole source is a method for acquisition of goods or services – *it should not be used to avoid competitive sourcing*

Sole source is the attempt to competitively source, resulting in only one qualified consultant/contractor capable of meeting the need

**General Sole Source Justifications:**

- Patented/Copyrighted materials
- Intellectual Property
- OEM (maintenance or repairs)
- Proprietary Item or Service
- Mandates of specific provider

**What is NOT a sole source justification (federal):**

- Price
- Continuity of Services or Products
- “familiar with UConn”
- Top expert
- Existing Professional Relationship

**Federal Sole Source Justifications (applies to spend $10K+):**

1. **Single source**, may include:
   a) only one good/service meets specification necessary for intended use **AND** is available from only one supplier
   b) Compatibility/Warranty/Compliance for existing equipment/software
   c) Purchase subject to a delivery requirement to fulfill an established commitment to funding agency **AND** supporting documentation of required dates is provided
   d) Other: *(SSJ needs to detail detrimental affects to the grant objectives and/or deliverables if the good/service is not used)*

2. **Federal Authorization**: Sponsor ‘expressly’ authorizes the non-competitive procurement in response to written request from PI. PI works with SPS to submit request to sponsor.

3. **Inadequate Competition**: previous procurement attempts from multiple sources did not result in successful, competent supplier

4. **Emergency** – federally declared emergency lifting competitive sourcing requirements

*The most significant change to the sole source section of UG (from the OMB circulars) is “continuity of research” will no longer be an acceptable justification for sole source approval.*
CONSULTANTS on FEDERAL or PRIVATE GRANTS – assigned to commodity 133

Team 4 (Research) reviews spend budgeted for consultant for the full award period

- If total budgeted spend is $10K+: sourcing is required (3 quotes or public bid)
- If total budgeted spend is < $10K: micro purchase threshold applies (1 quote)

**UG 200.320:** To the maximum extent practicable, the non-Federal entity should distribute micro-purchases equitably among qualified suppliers.

Consultants working on MULTIPLE grants assigned to commodity code 133:

- Spend is assessed for each grant award independently
- Sourcing threshold is based on total spend over the life of the award
Professional Services Contractors using grant or non-grant funds and non-grant Consultants (cc# 132) spend is calculated on fiscal year to date basis to determine need for competitive sourcing.

When a requisition is received, Procurement will review the supplier’s cumulative spend YTD as follows:

If the Purch Req value $\geq$ $10K$ : competitive sourcing is required (refer to sourcing thresholds)

If the Purch Req value $<$ $10K$ : Buyer IDs all POs issued YTD with a value $<$ $10K$ and totals:
  > If the total value YTD $\geq$ $10K$ : sourcing is required (3 quotes)
  > If the total value YTD remains $<$ $10K$ : micro purchase applies (1 quote)
Pre & Post Award Considerations

Consultant/Contractor with spend $10K+:

- Is a Univ, State or Consortia contract available for goods/services required (https://purchasing.ubs.uconn.edu/university-of-connecticut-contracts/)
- Does grant application detail any procurement exemptions or requirements for contractors, evaluators, consultants, etc.?
- Be prepared to supply 2 or more quotes from qualified candidates when ready to initiate purchase
- If sole source, detail the steps taken to identify other contractors/consultants, and why/how they were disqualified from consideration
- Retain back up for qualified consultants/contractors declining to quote to support sole source (lack of time, lack of resources, inability to meet the specifications, etc.)
- Private Sponsors may provide approval of a consultant/contractor without competitive sourcing. Refer to SPS for such approvals.
- Agreements should be initiated before work commences. Amendments or extensions to agreements sh/be implemented before expiration date.

Other considerations for Consultant/Contractor spend over $250K:

- Spend over $250K may require public bid before or after proposal submission
- Be prepared to allow time for bid process
- Public bid award is based on best overall proposal
DHHS SALARY CAP

Executive Level II salary cap is $199,300 year or $95.81 hourly

- Applies to all DHHS agencies:
  - NIH
  - HRSA
  - SAMHSA
  - AHRQ
  - CMS
  - FDA
  - ACL
  - ACF
  - ATSDR
  - CDC

- Limit is legislatively mandated by Congress via the annual *Consolidated Appropriations Act*
- Restriction should be considered at any level of effort, and for whatever period of time an individual might be charged to the award.
- Applies to all subawards.
AHA Award Guide Updates Effective December 2020

CARRYFORWARD OF UNEXPENDED FUNDS

AHA allows an investigator to carryover up to $20,000 without a written explanation

• Increase from $10,000 to $20,000

NO COST EXTENSION (NCE)

AHA will no longer accept no cost extension requests for balances under $5,000

• Increase from $500

• Can be done at the end of the final award year or at the time the Final Expenditures Report is submitted (90 days after the Award Year end date). A notice of disposition of the request will be sent to the PI.
• Carryover and No Cost Extension Updates and Reminders

• Carryover – The AHA allows an investigator to carryover up to $20,000 without a written explanation. For amounts over $20,000, the investigator must provide strong written justification, indicating the reason the funds were not spent and the investigator’s plan for spending those funds the following year, if the carryover is approved. Each request will be reviewed on a case-by-case basis. The expectation is that the approved carryover plus the next year’s budget will be fully expended in the next budget period. The investigator should not intentionally conserve funds to request a no-cost extension. If the funds are not expended during the period, the AHA may request a return of the unexpended balance for that budget period. Award funds must be used for expenses directly related to the approved AHA research project.

If an investigator is experiencing an issue(s) that is stalling or slowing progress on the project, they should include this information in their carryover justification. It is important that investigators meet project milestones and have a plan to manage the work to be completed on the approved project.

Our grants management system, ProposalCentral, does not have a mechanism for investigators/fiscal officers to indicate how they wish to handle an unspent balance. As a result, the investigator/institutional officer may be asked to indicate their plan for the remaining balance (e.g., do you plan to retain the balance or return it). The investigator/fiscal officer can send the staff a message using the Send Correspondence feature in ProposalCentral or email awards@heart.org.

No Cost Extension (NCE) – The AHA will no longer accept no cost extension requests for balances under $5,000. If the award has a remaining balance of $5,000 or less, the balance should be returned to the AHA. If the final payment has not been paid, this amount may be deducted before the AHA releases the payment to cover the reported expenses.

For Strategic Network awards, refer to the updated Award Guide relating to requirements on threshold amounts when requesting carryover or no-cost extension.
• Unless specifically stated otherwise in the award, sponsors require an acknowledgement of support and a disclaimer in any publication for which the grant supported the work to achieve the results. Review sponsor specific requirements for exact language and format to be used for acknowledgments and disclaimers.

• Publication costs for documenting, preparing, publishing, disseminating, page and reprint charges, and sharing of project findings and supporting material are generally allowable as direct charges on sponsored projects during the project period.

• Note that if the publication is supported by more than one sponsored award, the associated publication charges should be allocated to each account accordingly. These costs may also be allowable if incurred after the project expiration but prior to the University closeout of the sponsored award.
• Charges incurred after the award end date must be recorded in the award account at least 30 days prior to the closeout date to allow time for account reconciliation and preparation of the agency Final Financial Report (FFR).

• See Guidance on Scholarly Publication Costs for more information.

• Company billed statements – use Publishing Fees exp type

• Reimbursement– use Printing and Binding exp type, Publication Fees not currently available
Documents needed for an application to be accepted as “on time” by SPS:

- Proposal Budget template – Excel Format – File name: Budget
- Budget Justification Narrative – pdf format – File name: Budget Justification
- Abstract/Scope of Work – pdf format – File name: Scope of Work
- Guidelines – pdf format – File name: Guidelines
- Documents requiring institutional signature – pdf format – File Name Institutional Signatory
- Preview of application displaying all administrative components – pdf format – File Name: Application
- IPR form – completed, signed. REMINDER: DUE DATE needed
- FCOI, Cost Share, PI Eligibility Form and CV (when applicable) and Sub recipient documents (when applicable)
ERA will be phasing out the use of Internet Explorer for all its eRA modules by July 19, 2021

Supported browsers: Mozilla, Firefox, Google Chrome, Safari

If you encounter a problem with an eRA Module after a release, clearing out your browser cache should resolve the issue.
NIH’s OER has redesigned RePORT (Research Portfolio Online Reporting Tools).

RePORT is a one-stop shop for reports, data and analyses of NIH research activities. This tool can be used to obtain statistics on projects by Institute/Center, by states, and trends in major fields of study.

https://RePORT.nih.gov
ERA COMMONS LOGIN TIP

Remember to check the login information in eRA Commons if unable to access information.

If the information in the top right corner is incorrect, log out and log back in at https://era.nih.gov
NOT-OD-21-073, Upcoming Changes to the Biographical Sketch and Other Support Format Page

- In accordance with NOT-OD-21-073, NIH has updated its application forms and instructions to support the need for applicants and recipients to provide full transparency and disclosure of all research activities, foreign and domestic.

- Effective with due dates on or after May 25, 2021
NIH Biosketch Instructions: [https://grants.nih.gov/grants/forms/biosketch.htm](https://grants.nih.gov/grants/forms/biosketch.htm)

- Section A – include ongoing and completed research projects from the past three years that you want to bring attention to (previously known as research support and listed in Section D).

- Section B renamed to “Positions, Scientific Appointments, and Honors”. List in reverse chronological order (current listed first) for each sub-section.

- Section C – no changes published.

- Section D removed for non-fellowships and will be labeled “Scholastic Performance” for fellowships.
NIH BIOGRAPHICAL SKETCH AND OTHER SUPPORT

• NIH Other Support Instructions: [https://grants.nih.gov/grants/forms/othersupport.htm](https://grants.nih.gov/grants/forms/othersupport.htm)
  - Active, Pending AND Completed (within past 3 years) in sections labeled in that order.
  - If applicable, add a section for In-Kind Contributions before the Overlap section.
  - Optional to include eRA Commons ID with the Senior/Key Person’s name.
  - Include:
    - Research funding from foreign and domestic sources
    - Consulting Agreements (if research related)
    - In-kind contributions from outside entities (space, equipment, personnel, etc)
  - Do NOT include:
    - Training grants
    - Start-up funds or institutional resources (e.g. core facilities and shared equipment)
    - Gifts
  - Dates: current competitive cycle only (not the start date of the -01 award if a renewal award is active)
  - Amount: TOTAL costs for full competitive cycle of the award
  - Attach contracts in English for all foreign appointments.
  - Must include Key Person’s electronic signature.

ovpr.uconn.edu | ovpr.uchc.edu
PROPOSAL DEADLINE POLICY

Any Questions?

Go Live – May 5, 2021
All SPA meetings will be held at 10:30 am and will be online until further notice.

- May 19, 2021
- June 16, 2021