



POST AWARD GRANT MANAGEMENT AND PI RESPONSIBILITIES

Sherri Smith, Director, Post
Award



ORS/Post Award main duties



Post Award/Department/PI responsibilities



Post Award Financial Coordinator's workload



Cost considerations: Payroll, Procurement, Cost Transfers



Changes/Adjustments: Re-budgets (OPAS), No-Cost extensions



Required Progress reports



Preparing for closeout of the project (last 90 days)



Preparing the final financial report

AGENDA

ORS (specifically the Sponsored Program Coordinator) is the central resource for the negotiation of contracts at OU.



Reviews, negotiates and executes all basic research and subrecipient agreements.



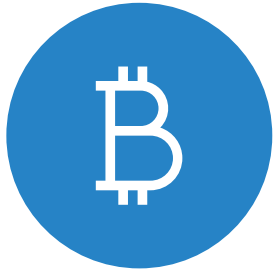
Responsible for all communications with the sponsor.



Handles no cost extension, change of PI, effort changes, etc.

OFFICE OF RESEARCH SERVICES

POST AWARD FINANCIAL SERVICES



PAFS (Post Award Financial Services) is the central resource for all post award administration and financial support to Principal Investigators, Departmental Administrators, and Sponsors.



Responsible for all activities concerning external and internal audits of sponsored project expenditures and audit resolution.



PAFS is also responsible for ensuring compliance of cost sharing, effort reporting, and cost allowability.



Responsible for invoicing, final report preparation and collection of funds.

FROM ORS TO POST AWARD



Fully-executed contract



ORS notifies the PI via email



Signature sheet



Setup the account in PeopleSoft



Post Award Financial Coordinators are assigned by department

RESPONSIBILITIES

PAFS

Expenditure Approval

- PAFS approves all CC, ePAFS, ERD's, Concur and cost transfers.

Financial Reporting

- PAFS reconciles and prepares all financial reports for all sponsored projects.

Invoicing

- PAFS invoices all sponsored projects that require an invoice with the current exception clinical trials.

Deposits

- All deposits related to sponsored programs are posted through PAFS.

Departments

First line compliance

Proper effort assignment

- Properly assigning effort to projects is crucial for the proper distribution of salary costs which are generally the most significant cost associated with sponsored projects.

Monthly Reconciliation

- Reconciliations are required on a monthly basis. These must be reviewed with the PI and signed by the PI to be considered complete.

RESPONSIBILITIES

Principal Investigators

Coordinate with the Department's business manager to ensure that personnel and other expenditure records are maintained.

Determine that any expenditure charged to an award, whether for personnel, supplies, equipment, travel, or other types of expenses, is allocable to the project as well as allowable and reasonable.

Certify time and effort reports monthly.

Monitor effort commitments to ensure that the PI and key personnel are meeting the effort commitments agreed to when the award was accepted, and update effort distribution as changes become known.

Review award expenditures monthly to ensure that expenditures are correct and appropriate.

Review and approve subrecipient agreement requests.

Review and approve subrecipient invoices for payment.

Review and approve other project changes, some of which may require sponsor approval (change to the scope of work, or significant change in a PI's effort on the project).



WHAT ARE COST PRINCIPLES

Institutions that receive federal funds for research must abide by federal “Cost Principles”. The principles are designed to provide that the Federal Government bear its fair share of total costs.

Provides that federal funding is treated on par with other sponsors.

It should be noted that most agencies (non-profit and commercial entities) also follow many of the federal guidelines on cost principles in their grants management operations.

OMB CIRCULARS/CFR TITLE 2

A circular is a federally mandated set of principles and guidelines used to determine costs applicable to grants and contracts.

The Office of Management and Budget (OMB) issues circulars/regulations that are applicable to various organizations.

In 2004 an area of the Code of Federal Regulations (CFR) was established (Title 2) as the location of policy guidance for grants and other agreements.



OMB CIRCULARS/CFR TITLE 2

These are the old circular numbers that you may still hear about occasionally but they have been replaced.

2 CFR part 220 (Circular A-21):

Cost Principles for Educational Institutions

2 CFR part 215 (Circular A-110):

Uniform Administrative Requirements for Grants and Agreements With Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations

2 CFR part 230 (Circular A-122):

Cost Principles for Nonprofit Organizations

Circular A-133:

Audits of States, Local Governments, and Non-Profit Organizations



CIRCULAR A-81

Effective Dec 2014 the Office of Management and Budget activated the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards from the Office of Management and Budget (2 C.F.R. § 200)

...superseded requirements from OMB Circulars A-21, A-87, A-110, and A-122 (which have been placed in 2 C.F.R. Parts 220, 225, 215, and 230); Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up” (it is often called the **Uniform Guidance [UG]** or **Circular A-81** or the **Omni-Circular**)

DIRECT COSTS

- ✓ Expenses identified specifically with a particular sponsored project, instructional activity, creative or artistic pursuit, or other institutional activity
- ✓ Expenses that can be assigned to a particular sponsored project with a high degree of accuracy
- ✓ Must be allowable, allocable, reasonable & necessary for the program, given consistent treatment and conform to sponsor limitations

DIRECT COSTS-ALLOWABLE



Is it a project related expense?



Does it conform to the limitations or exclusions in the OMB/CFR guidance for your organization?



Does it meet sponsor guidelines?



Does it comply with institutional policies?

DIRECT COSTS-ALLOCABILITY



Is the cost easily assignable to the proposed work the Primary Investigator is projected to accomplish?



If a cost benefits two or more activities then you need to determine the costs for each one based on the proportional benefit; if you can't determine the proportion then the basis of allocation must be reasonable. (work with sponsors)



Costs allocable to a project can't be shifted to another project to eliminate deficits or for convenience.



DIRECT COSTS- REASONABLE

- ✓ Would an average person agree that this cost is reasonable and necessary for the work to be performed?



DIRECT COSTS- CONSISTENTLY TREATED

- ✓ Are the same types of expenditures treated in similar ways regardless of the sponsor? (consistency)
- ✓ Are any exceptions covered under institutional policy?

FACILITIES & ADMINISTRATIVE COSTS

- ✓ Costs incurred for common or joint objectives which cannot be allocated to a specific direct cost activity
 - ✓ Facilities (lab and office space)
 - ✓ Salaries of administrative, clerical staff, custodian, HR staff, etc.
 - ✓ Libraries and other common buildings
 - ✓ Building maintenance, utilities

Budget Period – Period that is covered by current budget

Project Period – Period of the entire project

-some awards are for multiple years (project period) but a new acct has to be set up for each year (budget period)
These typically do not allow carry-forward of unspent funds.

BUDGET PERIOD VS. PROJECT PERIOD



PAYROLL CONSIDERATIONS

ePAF's & EDR's

- New Hires
- FTE changes
- Special Pays
- Change payroll distribution
- **In comments section please include the anticipated end date.**

Who's working on what project?

- Responsible for verifying labor & effort on grant

What if someone is not paid on the correct account?

- labor confirmation report
- PET's
- timeliness
- justification

LABOR
CONFIRMATION
&
EFFORT
REPORTS

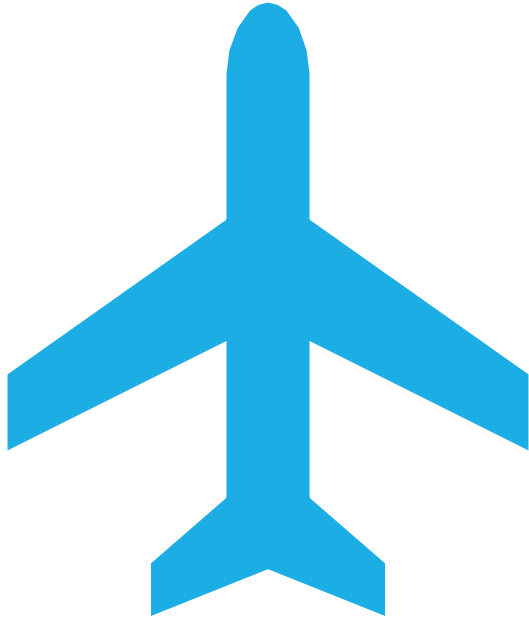
Labor Confirmation Review & Confirm

- Who was paid
- FTE
- Amount paid
- Account paid from
- If anything is incorrect – please mark thru and notate what it should be on the form before signing and returning.

Contributed Labor Review & Confirm

- Who contributed the labor
- Percent of pay contributed
- Amount contributed
- Account paid from

TRAVEL CONSIDERATIONS



Budgeted Travel

- Specific trips budgeted
- Who is traveling?
- How does it relate to the research project?

Federal Awards

- Fly America Act
- Open Sky's

Foreign Travel

- Specifically budgeted is best
- Pre-approval recommended



TUITION CONSIDERATIONS

Tuition Rates

- Tuition codes
 - 632505 – old rate
 - 632405 – non-tuition bearing grant
 - 632305 – new flat rate
- Non-tuition bearing grant
 - GRA will still receive tuition waiver if qualified

LABOR CODES

FY20 PAFS LABOR CODES		
	CODES	TYPE OF LABOR
	630005	Academic - Faculty
	631105	Academic - Faculty Summer
	632305	Graduate Research Assistant - New Monthly Tuition Rate
	632405	Graduate Research Assistant - No Tuition Allowed
	632505	Graduate Research Assistant - 16% Tuition Rate
	637005	Other Academic
	650005	Non-Academic - Monthly
	700005	Hourly

FRINGE RATES

FY20 PAFS FRINGE RATES		
FY19	RATE	TYPE OF LABOR
39.95%	41.20%	Benefits Eligible
32.33%	33.20%	Benefits Eligible under Alt Retirement Plan (w/out OTRS)
19.60%	24.80%	Limited Academic (Only these Job Codes)
		Adjunct (1721)
		Postdoctoral Fellow (5515)
		Postdoctoral Res. Assoc. (6481)
		Postdoctoral Res. Fellow (5669)
		Research Fellow (5944)
		Scholar (6511)
		Visiting (1725)
9.70%	9.20%	No Benefits Eligible
9.70%	12.80%	Graduate Research Assistant + Monthly TU Rate or 16% Tuition Remission
0.40%	0.30%	Other Students
14.04%	12.56%	Supplemental
24.70%		Peak



COST TRANSFER CONSIDERATIONS

What's required?

- PAFS-1 Form, PS statement, invoice
- Justification
- How does it benefit the research?
- Why was it charged to the wrong account?

Over 90 days ago?

- Higher audit risk
- Requires strong justification
- Requires PAFS Director approval

RE-BUDGETING CONSIDERATIONS

- Best to spend as closely as possible to the awarded budget
- Award have different thresholds for re-budgets (be familiar with award terms)
- PAFS Coordinator can assist in determining threshold
- Will the re-budget change the scope
- Justification
- OPAS to PAFS to start the process
- PAFS will work with ORS to get sponsor approval if required

COST SHARE CONSIDERATIONS

- Less is best
- Mandatory cost share must be documented (and voluntary cost share that is quantified may be required by sponsor)
- Contributed labor
- Expenses from other OU account
- Expenses from 3rd Party
- PAFS Coordinators report mandatory cost share to sponsor
- Must document as we invoice – without it we will not get paid

90 DAYS BEFORE END DATE

- Expenses have more restrictions
- No equipment purchases w/out sponsor approval
- Computer purchases will require very strong justification or sponsor approval
- Cost transfers will be highly scrutinized
- Other institutions fined for “trying to spend down” award at end of grant period

AFTER END DATE

- PAFS will submit all required financial reports
- Once the Final has been submitted to the Sponsor and payment has been received the project is ready to be closed and inactivated in PS.
- As part of close-out some awards will go back to SPC for some actions.



CONTACTS

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